Anita

Van Waters & Rogers Inc.

subsidiary of Univar

600 HUNTER DRIVE
OAK BROOK, IL 60521
PHONE (312) 573-4300

CERTIFIED MAIL #P952-620-524
RETURN RECEIPT REQUESTED

January 30, 1989

Mr. Basil G. Constantelos, Director
Waste Management Division 5H-12
U. S. EPA, Region 5
230 South Dearborn Street
Chicago, IL 60604

RE: Van Waters & Rogers Inc.
Bedford Heights, Ohio
OHD 071 107 791
Minor Permit Modification

Dear Mr. Constantelos:

Attached, as requested in your letter dated January 23, 1989 (included for your immediate reference), is a list of emergency coordinators for the facility referenced above. The list has been updated and revises our Contingency Plan. The original submittal on June 10, 1987 requested a minor modification of our RCRA Part B permit. Please review the updated list of emergency coordinators and determine if our permit may be modified as requested.

Since the original submittal of the request for a minor permit modification, Van Waters & Rogers Inc. has decided to close the Bedford Heights facility. Please consider this letter formal notification that we intend to initiate closure activities in accordance with the closure plan approved in our Part B permit. We anticipate being able to begin closure of the hazardous waste container storage unit there by March 15, 1989.

If you have any questions about the information submitted herein or our notification of our intent to close the hazardous waste management facility, please feel free to call me.

Very truly yours,

James Hooper

James P. Hooper
Regional Regulatory Manager
Central Region

JPH:be

Attachments

COPIES TO: R. D. Hickman
Russ Karney
John Vansil
File

JAN 25 REC'D

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

JAN 2 8 1989

5H-12

Mr. Robert D. Hickman
Regional Regulatory Manager
Van Waters & Rogers, Inc.
600 Hunter Drive
Oak Brook, Illinois 60521

RE: Minor Permit Modifications
Van Waters & Rogers, Inc.
Subsidiary of Univar
Bedford Heights, Ohio 44146
OHD 071 107 791

Dear Mr. Hickman:

This is to acknowledge the receipt of your letter of June 10, 1987, which requested a modification of your Resource Conservation and Recovery Act (RCRA) permit, and your revised Contingency Plan. The modification requested reflects changes in the personnel who would address emergency situations at the above-referenced facility. Their names, addresses, work and home telephone numbers are listed in the revisions. These changes may be considered minor permit modifications under 40 CFR 270.42; however, the revised Contingency Plan is incomplete and no final determination will be made until the following information is submitted:

Section IV (A):

(3) Russ Metzger's home address,
(6) James F. Lacey's home address and home telephone number.

Upon receipt of the revisions, U.S. EPA will review the information and either approve or deny your permit modification request. A copy of the revision is enclosed.

Please contact Ms. Anita L. Boseman of my staff, at (312) 353-4734, if you have any questions.

Sincerely,

David A. Ullrich

for Basil G. Constantelos, Director
Waste Management Division

Enclosure

5H-12

Mr. Robert D. Hickman
Regional Regulatory Manager
Van Waters & Rogers, Inc.
600 Hunter Drive
Oak Brook, Illinois 60521

RE: Minor Permit Modifications
Van Waters & Rogers, Inc.
Subsidiary of Univar
Bedford Heights, Ohio 44146
OHD 071 107 791

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(6) ~~Regional Vice President~~ James F. Lacey's home address and home telephone number.

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Please contact Ms. Anita L. Boseman of my staff, at (312) 353-4734, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Tom Crepeau, OEPA-DSHWM
Paul Vandermeer, OEPA-DSHWM
Sheryl Slone, OEPA-NEDO
Russ Karney, Van Waters & Rogers, Inc.
James P. Hooper, Van Waters & Rogers, Inc.

5HR:BOSEMAN:bd:01/06/89

01/18/89

Regional Regulatory Manager
Van Waters & Rogers, Inc.
600 Hunter Drive
Oak Brook, Illinois 60521

RE: Minor Permit Modifications
Van Waters & Rogers, Inc.
Subsidiary of Univar
Bedford Heights, Ohio 44146
OHD 071 107 791

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Please contact Ms. Anita L. Boseman of my staff, at (312) 353-4734, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Tom Crepeau, OEPA-DSHWM
Paul Vandermeer, OEPA-DSHWM
Sheryl Slone, OEPA-NEDO
Russ Karney, Van Waters & Rogers, Inc.
James P. Hooper, Van Waters & Rogers, Inc.

5HR:BOSEMAN·bd·01/05/89

1/18/89

RCRA PERMITS	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	1/17/89	1/17/89					1/18/89	1/19/89	1/20/89	1/23/89

GRAHAM & JAMES
ONE MARITIME PLAZA
THIRD FLOOR
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 954-0200

OTHER OFFICES
LOS ANGELES, CA
LONG BEACH, CA
NEWPORT BEACH, CA
PALO ALTO, CA
NEW YORK, NY
WASHINGTON, DC
RALEIGH, NC
SINGAPORE
HONG KONG
MILAN

AFFILIATED OFFICE
KUWAIT

TELEX
W.U. 340143 CHALGRAY SFO
M.C.I. 67565 GJ SFO

FACSIMILE
G1/II (415) 391-8966
G II/III (415) 391-2493

CABLE
CHALGRAY, SAN FRANCISCO, CA

WRITER'S DIRECT DIAL NUMBER

(415) 954-0246

October 18, 1986

USEPA Region V
P.O. Box A357
230 South Dearborn Street
Chicago, Illinois 60604

Re: Transfer of the McKesson Faciliti(ies) Located in Cincinnati, Bedford Heights and Columbus, Ohio

Dear Sir or Madam:

We are counsel for DSW, Inc., a Washington Corporation ("DSW"), which holds interim status, a permit, or an EPA Identification Number from your agency for the above-referenced facility. As you are aware, DSW has entered into an agreement to acquire substantially all of the assets of McKesson Chemical Company, a division of McKesson Corporation. DSW has applied to your agency for the transfer of the existing interim status, permit, or EPA Identification Number into its name. Application materials and financial responsibility documents were recently sent to you, and representatives from McKesson Chemical Company have been in touch with you or your staff in connection with these applications.

We have recently been informed that Univar Corporation, which will own all of the outstanding stock of DSW after the closing of the Asset Purchase and Sale Agreement, wishes to change the name of DSW to "Van Waters & Rogers, Inc." Since Univar currently operates a chemical distribution division under the name, "Van Waters & Rogers", this action will enable it to conduct all of its chemical distribution activities throughout the U.S. and Canada under the "Van Waters & Rogers" name.

Accordingly, we would like to have your advice as to the best way in which to accomplish the intended name change. There appear to be at least two options:

1. To issue the interim status or permit at the time of closing (or as shortly thereafter as you can accomplish the tranfer), in DSW's current name, and then, at a subsequent date, to have DSW file appropriate documents with you in order to have the interim status or permit reissued in DSW's new name; OR

2. To issue the interim status or permit in the name of "Van Waters & Rogers, Inc.", instead of in the name "DSW, Inc.", thereby avoiding a second step.

It is our feeling that it would make sense to use the second option. Assuming this option is acceptable, you will receive, immediately after the closing under the Asset Purchase and Sale Agreement, the following items:

a. Notification by DSW that the transaction has closed and its name has been changed to "Van Waters & Rogers, Inc.",

b. Notification by McKesson Chemical Company that the transaction has been closed,

c. A revised Form 8700-12, and, where appropriate, a revised Part A application and Part B certification, for the referenced facilities indicating that the name of the acquiring corporation is "Van Waters & Rogers, Inc." and,

d. Complete final documentation of financial responsibility for both closure costs and financial liability, all in the name, "Van Waters & Rogers, Inc."

I hope that you will be in a position to respond quickly to this request for your assistance, in order for us to determine which of the above options (or any other option

which you may find preferable) should be used to complete the proposed name change in an effecient manner. A representative of McKesson Chemical Company or DSW will be calling you or your staff in a few days in order to discuss any recommendations which you may have.

Thank you very much for your kind attention to this matter.

Very sincerely yours,

Robert C. Thompson

Robert C. Thompson
of
GRAHAM & JAMES

RCT:mes

McKesson Chemical Company Central Region
600 Hunter Drive, Oak Brook " 60521 Tel 312 986 4300

McKesson

April 7, 1986

Mr. David A. Stringham
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

RE: McKesson Chemical Facility
26601 Richmond Road
Bedford Heights, OH 44146
EPA I.D. #OHD071107791

Dear Mr. Stringham:

Thank you for your letter which we received on January 30, 1986 relating to the possibility of prior or current releases of hazardous wastes or constituents from solid waste management units at our facility.

In addition to the units described in our application, we also maintain an elementary neutralization pit at the facility. The pit is approximately 5'x5'x6' in size and is capable of holding about 1,500 gallons of waste. We typically treat approximately 2,500 gallons of waste per month in the pit. The material in the pit generally consists of drum washwater resulting from rinsing of empty drums returned by customers prior to reuse. When full, these drums contain either virgin acid or alkalie product. Because the aqueous material entering the neutralization unit is dilute, and typically does not meet the definition of corrosivity set forth in 40 CFR 261.22, we consider it to be non-hazardous waste. It is, of course, possible that the unit may occasionally receive material which, prior to neutralization, may be considered hazardous.

To the best of our knowledge, there have been no releases of hazardous waste or constituents from units at the facility, with the possible exception of the neutralization pit. In 1982, the liner slipped down the side of the pit. There was a loss of 40 gallons neutralized material. The liner was pulled up after emptied. All remaining residue was neutralized and pumped out as quickly as possible. However, McKesson has no available records or data that would provide definitive, reliable, or measurable information concerning the specific details or environmental impact of any such releases.

(cont'd)

This response is furnished to you in accordance with our understanding of the applicable provisions of Section 3004 of RCRA, and we trust it is adequate to respond to your information request. Please do not hesitate to contact the undersigned if you have questions.

Very truly yours,

McKESSON CHEMICAL COMPANY

Ronald R. Powell
Regional Vice President

RRP:be

COPIES TO: B. D. Biehl
File

McKesson Chemical Company
136 Summit Avenue, Montvale NJ 07645 Tel 201 573 9480

McKesson

November 30, 1983

Mrs. Karen Heyob
Division of Hazardous Materials Management
Ohio EPA
361 Broad Street
Columbus, Ohio 43215

RE: Hazardous Waste Permit Applications
#02-18-0628 Bedford Heights, Ohio
#05-31-0629 Evendale, Ohio
#01-25-0632 Columbus, Ohio

Dear Karen,

Two more pages - in conformance with your recent suggestion, I have rewritten pages 4 and 5 of the "Waste Analysis and Verification Procedures" section of the reference Part B application to provide a random weighing protocol in place of the physical inspections of drums outlined in the previous version. Sufficient copies are enclosed for all three branches' files, and I'll keep Jim Mayka up-to-date.

Thanks for your continued input and successful attempts to establish a practical mechanism for this troublesome item.

Sincerely,

McKESSON CHEMICAL COMPANY

Donald Black

Donald M. Black
Regulatory Compliance Manager

DMB:dc

CC: G. Bennett, Manager, Columbus
C. Moll, Manager, Bedford Heights
I. Byers, Manager, Evendale
James N. Mayka

6. Upon arrival of a given number of drums of spent solvents at the McKesson branch for temporary storage, the following verification procedure will be followed:

   a) If a generator ships a batch of drums of a given material consisting of ten (10) drums or less, one drum will be randomly selected and weighed.

   b) If a generator ships a batch of drums of a given material consisting of more than ten (10) drums, a random selection of a number of drums from the shipment equalling ten percent of the total number of drums will be weighed.

   A calculated specific gravity of the contents of the drum(s) will be determined by dividing the net weight of the contents of the drum by the volume of the contents, estimated by thumping the side of the drum. A rough verification of the chemical nature of the contents of the drum can then be determined:

Lbs/Gal.	Sp. Gr.	Probable Chemical Species
> 7.85	1.0	Halogenated (Cl, F)
7.85	1.0	Aqueous
< 7.85	1.0	Hydrocarbon, Oxygenated

Upon completition of this weighing step and verification of the order of magnitude of the specific gravity of the spent solvent determined, the person having conducted such verification shall sign the manifest, and make notification on the manifest as to the number of drums checked. If the material received does not pass the verification check, notation shall be made on the manifest and the shipment refused,

This verification check of drums shall be in addition to the standard policy of taking count of the number of drums present versus the manifested quantity, checking of labels to verify the product name being the same as that on the manifest, and inspection of the condition of the drum(s) to ensure their integrity. Concerns or inaccuracies in any of these areas shall constitute grounds for the rejection of the shipment.

7. Upon notice to McKesson Envirosystems that a McKesson Chemical branch desires to move an accumulated load of spent material to a refinery, McKesson Envirosystems' headquarters in Fort Wayne, Indiana, simultaneously forwards a copy of all data accumulated on a particular waste stream to the respective recycling facility for review and filing at that location if not already on file, so that this information is available before actual receipt of the waste stream.

6. Upon arrival of a given number of drums of spent solvents at the McKesson branch for temporary storage, the following verification procedure will be followed:

   a) If a generator ships a batch of drums of a given material consisting of ten (10) drums or less, one drum will be randomly selected and weighed.

   b) If a generator ships a batch of drums of a given material consisting of more than ten (10) drums, a random selection of a number of drums from the shipment equalling ten percent of the total number of drums will be weighed.

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Foremost-McKesson
Chemical Group
McKesson Chemical Company

135 Summit Avenue
Montvale, NJ 07645
201 573 9480

McKESSON CHEMICAL

October 28, 1983

Mrs. Karen Heyob
Division of Hazardous Materials Management
Ohio EPA
361 Broad Street
Columbus, Ohio 43215

RE: Hazardous Waste Permit Applications
#02-18-0628 Bedford Heights, Ohio
#05-31-0629 Evendale, Ohio
#01-25-0632 Columbus, Ohio

Dear Karen,

I am responding to your letter of October 3, 1983 with a carton of material under separate cover — an additional copy of each of the Part B Applications for our branches in Evendale, Columbus, and Bedford Heights, plus a set of the modifications in duplicate of those applications as requested by the office of your Attorney General. The modifications have been incorporated into the three copies. Additional comments are attached to this letter.

In these modifications, I have maintained a steady reference to CPR 122.25 rather than the new 270.14 in an attempt to keep the reference straight.

I am sending a set of the changes to Jim Mayka for insertion into his file copies.

Sincerely,

McKESSON CHEMICAL COMPANY

Donald Black

Donald M. Black
Regulatory Compliance Manager

DMB:dc

CC: C. Moll, Manager, Bedford Heights Branch
I. Byers, Manager, Evendale Branch
G. Bennett, Manager, Columbus Branch
Jim Mayka, Region V USEPA

FOREMOST McKESSON

RESPONSE TO COMMENT SHEET

General

1. A new page 1 of Form 3 of the Part A copy of each branch is provided to establish a basis of 110 drums (6050 gallons) as a maximum that will be stored at any one time at the branch.

Part A

2. Preceding will correct in the case of the Evendale branch.

Waste Analysis Plan

1,3. The operative words in the cited references are "if necessary". McKesson's experience with storage of spent solvents destined for recycling over the last 10-12 years has indicated no real problem in this area. However, in order to have a procedure available, we have developed a modified Waste Analysis and Verification Procedure — copy appended — to replace in toto that in the original Part B Application. The changes involve a procedure for verification at the McKesson branch, prior to any shipment to the recycling center, if any is deemed necessary. We cannot ask our relatively unsophisticated truck drivers to evaluate chemical species at the generator's plant, although he is relied upon for checking a number of physical parameters as detailed in the procedure.

In addition, page 3 et seq. of the Waste Analysis Plan narrative have been rewritten (and renumbered as necessary) and expanded to define parameters of analyses, test methods, and a standard sampling procedure.

2. Since none of these Ohio branches has been really operative in storage of regulated recyclable materials, examples of waste analyses depicting the sequence of analyses normally followed in McKesson's handling of such materials have been drawn from a McKesson branch that has been in the business for 10-12 years. These follow the "Waste Analysis and Verification Procedures" narrative.

Please replace all pages from Page 3 on in the narrative under Tab 122.25(a)(3) to accomodate all the preceding in the proper sequence.

RESPONSE TO COMMENT SHEET (Cont'd)

Procedure, Structures, Equipment

1. Page 4 of "Container Management Practices" has been added to, and a diagram appended depicting the spent solvent drums storage pattern at each branch.

2. It has long been a practice of McKesson Chemical to encourage awareness on the part of public authorities of a branch's existence and of what it is doing. The Company as a matter of course — well prior to its proposed hazardous waste storage activity — has distributed copies of its Contingency Plan to local police, fire, and hospital organizations. Fire Departments have invariably responded, and branches are normally inspected periodically by that function. Copies of the letters acknowledging receipt of these Plans are filed under the "Distribution" section of the branch's Contingency Plan.

Personnel Training

1-5. A new standard "Personnel Training" narrative has been prepared and a copy is enclosed; it is felt that the points raised are encompassed. Please discard all the present section except for the portion dealing with hazardous waste transport.

Contingency Plan

1. A new standard Contingency Plan narrative has been prepared and a copy is enclosed. The capabilities of the emergency equipment are addressed.

2,3. Advantage is being taken of this submission to the Ohio EPA office to update the personnel sections of the Contingency Plans of the three Ohio branches to reflect changes in McKesson personnel that have occurred since the original submission. Corrected versions for each branch follow the new Contingency Plan narrative.

4. (For Evendale only) The requested additional flood emergency procedure is encompassed in a new page 2 of the "Facility Location Information" section. Similarly, an additional page reflecting these revised procedures has been prepared for the Evendale Contingency Plan to be filed under Tab XI.

RESPONSE TO COMMENT SHEET (Cont'd)

Secondary Containment System

1. This section of the three applications bas been modified as requested and replacement pages are appended. Please replace the first and last pages of the narrative under Tab 122.25(b)(1) for Columbus and Bedford Heights, and the entire section for Evendale.

Closure Plan

1. A new first page for the Evendale Plan is appended.

OCT 1 2 1985

5HS-JCK-13

Mr. Donald M. Black
Regulatory Compliance Manager
McKesson Chemical Company
309 State Street, P.O. Box 266
North Haven, CT 06473

RE: Withdrawal of RCRA Permit
McKesson Chemical Company
OHD 039 991 690

Dear Mr. Black:

This is to acknowledge the receipt of your letters dated August 21, 1985, and September 30, 1985, requesting the withdrawal of your previously issued Resource Conservation and Recovery Act (RCRA) permit. The United States Environmental Protection Agency (U.S.EPA) issued this permit to McKesson Chemical Company on September 30, 1983, to store hazardous wastes in containers. According to the information which you have submitted, your facility was never operated as a regulated storage facility as defined in 40 CFR 264.1. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under section 3005 of RCRA and the permit is hereby withdrawn.

In your letter of September 30, 1985, you stated that McKesson Chemical Company was closing the above-facility. Because McKesson Chemical never operated the facility as a treatment, storage, or disposal facility, a closure plan will not be required. Your U.S. EPA I.D. number will also be terminated for this facility along with the permit.

Please contact Ms. Lisa Pierard, of my staff, at (312) 886-0656 if you have any questions or require any further assistance.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Ronald R Powell, Regional Vice-President
Mckesson Chemical Company
Chris Bowers- OEPA
Don Marshall- SWDO - OEPA

bcc: Part B File
Part A File
Lisa Pierard

5HS-JCK-13:L.Pierard:G.Waters:Disk #2:10-11-85:

11 OCT 1983

RE: McKesson Chemical Company
26601 Richmond Road
Bedford Heights, Ohio 44146
U.S. EPA ID No.: OHD-071-107-791

Dear Sir/Madam:

This letter serves to inform you that the United States Environmental Protection Agency (U.S. EPA) has today issued a Resource Conservation and Recovery Act (RCRA) permit to McKesson Chemical Company to store hazardous waste in containers at the above-referenced location. Based on our review of the facility's permit application, we determined that the permitting requirements of 40 CFR Parts 264 and 270 had been satisfied. The permit will expire ten years from today's date. U.S. EPA may modify, revoke and reissue, or terminate the permit, based on any causes specified in 40 CFR 270.40-270.43.

We appreciate your interest in the draft permit prepared by our Agency and announced in our July 22, 1983, "Notice of Preparation of a Draft RCRA Permit". We have enclosed a copy of our "Response to Comments", which was prepared in accordance with 40 CFR 124.17. If you have any questions concerning the permit, please contact James Mayka, of my staff, at (312) 353-2197.

Sincerely,

Richard E Bartelt

Basil G. Constantelos, Director
Waste Management Division

Enclosure

089-34

United States Department of the Interior

FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

Columbus Field Office
3990 East Broad Street
Columbus, Ohio 43215

September 15, 1983

Mr. Karl Klepitsch, Jr., Chief
Waste Management Branch
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Rochele Bennett

Dear Mr. Klepitsch:

This responds to your July 20, 1983 letter on the proposed RCRA permit for McKesson Chemical Company (MCC), 26601 Richmond Road, Bedford Heights, Ohio.

In general, the U. S. Fish and Wildlife Service's concerns with hazardous waste sites are (1) location; (2) endangered species; and (3) contamination of fish and wildlife.

Location

We believe that the proper location for a hazardous waste facility is outside the 100-year floodplain. Additionally, a wetland area is inappropriate for location of a hazardous waste facility. The draft permit has no map showing the location of the facility. Therefore, we cannot provide assistance in determining whether the facility is located in a wetland or a floodplain.

The discharge of the stormwater is another concern. Stormwater should not be directed into any stream or other body of water without treatment or some assurance that the runoff does not contain hazardous wastes or promote uptake of contaminants.

Endangered Species

A review of information in our files indicates there are no endangered, threatened, or proposed species present in the project area. This precludes the need for further action on this project as required by the 1973 Endangered Species Act, as amended. Should the project be modified or new information become available that indicates listed or proposed species may be affected, consultation should be initiated.

089-33A

Facility: McKesson Chemical Co., Bedford Heights, Ohio

Contamination of Fish and Wildlife

Based on a telephone conversation August 18, 1983, with the company's personnel, we understand there is little or no habitat capable of supporting wildlife located near the site. Therefore, we have no comments regarding contamination of wildlife by this facility. Similarly, the runoff is captured and tested before it is discharged to the municipal sewer system presenting little opportunity to contaminate surface waters.

Thank you for the opportunity to review the proposed RCRA permit. If you have questions concerning these comments, please contact Mr. T. J. Miller (FTS 374-6650).

Sincerely yours,

Kent E. Kroonemeyer

Kent E. Kroonemeyer
Supervisor

cc: Ohio EPA, Attn: L. Roggencamp, Columbus, OH

29 SEP 1983

5HW-13

Mr. Cliff Moll
Branch Manager
McKesson Chemical Company
26601 Richmond Road
Bedford Heights, Ohio 44146

RE: McKesson Chemical Company
26601 Richmond Road
Bedford Height, Ohio
U.S. EPA ID No.: OHD-071-107-791

Dear Mr. Moll:

Enclosed is a copy of the Resource Conservation and Recovery Act (RCRA) permit for the above-referenced facility. Today's date is the effective date of the permit, and the permit will remain in effect through the tenth anniversary of today's date, unless the permit is modified, revoked and reissued, or terminated pursuant to 40 CFR 270.40-270.43.

You have the right to appeal any condition of the permit, pursuant to 40 CFR 124.19. Failure by your company to comply with any condition of the permit may result in civil and/or criminal penalties.

If you have any questions, please contact James Mayka, of my staff, at (312) 886-7443.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Charles Wilhelm Chief
DHMM-OEPA

Peggy Vince, Executive Director
HWFAB

Donald Black

[redacted] STU #1 CHIEF STU #2 CHIEF STU #3 CHIEF TPS CHIEF WME CHIEF [redacted] DIRECTOR

089-37

Foremost-McKesson
Chemical Group

McKesson Chemical Company
Eastern Region
136 Summit Avenue
Montvale, NJ 07645
201 573 9480

McKESSON CHEMICAL

July 6, 1983

Mrs. Karen Heyob
Division of Hazardous Materials Management
Ohio EPA
361 Broad Street
Columbus, Ohio 43215

RE: HAZARDOUS WASTE PERMIT APPLICATION #05-31-0628

Dear Karen,

Enclosed are two copies of our updated Closure Plan and Financial Assurance documentation for inclusion in the Part B Application for a storage permit at our branch in Bedford Heights, Ohio. These can replace the initial corresponding section in the Application, which "expired" March 31, 1983.

I am also sending two sets to Jim Mayka at Region V, USEPA.

We're looking forward to seeing you in August.

Sincerely,

McKESSON CHEMICAL COMPANY

Donald Black

Donald M. Black
Regulatory Compliance Manager

DMB:dc

CC: Cliff Moll, Manager, Bedford Heights Branch
James N. Mayka, USEPA Region V

FOREMOST McKESSON

OhioEPA

Re: McKesson Chemical Company
Bedford Heights Branch
OHD071107791
#02-18-0628

May 27, 1983

Kathy Homer
U.S. EPA, Region V 5HW
230 S. Dearborn St.
Chicago, Illinois 60604

Dear Kathy,

Attached please find the fact sheet and draft permit for McKesson Chemical Co. (Bedford Heights). We have not included the attachments because U.S. EPA has a copy of the complete application. Please note that McKesson Chemical Co. has not yet submitted all the required information. The facility is still required to submit a closure cost estimate and a revised financial responsibility document. This required information should be submitted by June 30, 1983. They also need to provide a certification of modification for their containment system within 60 days after the date their permit is issued. We do not believe that this information will require changes in the fact sheet or draft permit.

Yours truly,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/maf

Attachment

cc: Tom Carlisle, DHMM
Tom Crepeau, DHMM
Ken Westlake, USEPA, Region V
Steve Tuckerman, NEDO
Laura Whitacre, ES, DHMM

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43216-1049, (614) 466-8565

089-18

Foremost-McKesson
Chemical Group

McKesson Chemical Company
Eastern Region
136 Summit Avenue
Montvale, NJ 07645
201 573 9480

May 20, 1983

McKESSON CHEMICAL

Ms. Karen Heyob
Division of Hazardous Materials Management
Ohio EPA
361 East Broad Street
Columbus, Ohio 43215

RE: HAZARDOUS WASTE PERMIT APPLICATION #02-18-0628

Dear Karen:

This letter presents several clarifications and embellishments of the reference Part B Application for our Bedford Heights branch, patterned after those requested for the similar Application filed on behalf of the McKesson branch in Columbus. Included is the additional information requested at our meeting of March 17, 1983, as well as responses to subsequent conversations with Jim Mayka of Region V. Suggestions as to where to insert what are attached. In addition:

1. Analyses: The statement you requested covering our adhering to the analytical procedures laid out in SW-846 appears on the appended revised page 4 of the "Waste Analysis Plan".

2. Closure: Because our new fiscal year began April 1, 1983, we are recalculating our closure costs for this branch as required by statute. In addition, we will build into these figures costs associated with using an outside firm as a receiving station for any drums of hazardous wastes present at this McKesson branch at the time of closure. As evidence of this approach, a copy of a letter from the nearby Solvent Resource Recovery, Inc., facility citing prices for such services is appended. Debbie Tegtmeyer has agreed to the statutory due date of June 30, 1983.

3. Secondary Containment Area: As you know, I have had several telephone conversations with Jim Mayka of Region V regarding increasing the capacity of our bermed area to allow for an extraordinary rainfall. After subsequent conversations with the Soil Conservation Service of the U.S.D.A., we are defining this phenomenon as a 100-year, 24-hour rainfall and will increase the height of the berm from 6 inches to 9 inches to allow for 5 inches of rain. We also commit ourselves to the 10 foot by 30 foot dimension.

089-14

3. Secondary Containment Area cont'd.: The redesign will include a sump to facilitate complete removal of any liquids present inside the area.

   To simplify matters, I have rewritten the entire section, so only simple replacement of the current version is required.

4. Contingency Plan: At the latest, we will have a complete inventory of all emergency equipment listed in the Contingency Plan at the branch by the time a permit is readied. We acknowledge that Tom Crepeau is to be kept up-to-date with any revision of the Plan.

All attached pages (including the new Contingency Plan) are in duplicate, and I am sending two copies of everything to Jim Mayka.

We are looking forward to seeing what a draft permit looks like.

Sincerely,

Donald Black

D. M. Black
Operations Department

DMB/cb

cc: Clifford Moll, Manager Bedford Heights Branch
James Mayka, USEPA Region V

McKESSON CHEMICAL COMPANY - BEDFORD HEIGHTS

RESPONSE TO ADEQUACY REVIEW COMMENTS

Please:

A. No change required in Part A

B. Facility Description

B-1 Replace existing page 4 with revised page 4.

B-2 Add the new page 5 and plot plan indicating information requested.

B-4 Add new page 2 and the road map to this section (or to 122.25(a)(10)).

C. Waste Characteristics

C-2,C-2c Discard pages in application entitled "Waste Analysis Plan" including "Wastes to be Handled" (sample attached) and replace with new section under 122.5(a)(3) with the same title and a new page 5 entitled "Waste Analysis and Verification Procedures".

D. Process Information

D-1a Add new page 3 titled "Containers Utilized Holding Free Liquids"; replace "Secondary Containment System Design and Operation" with new version.

F. Procedures to Prevent Hazards

F-2 Replace existing Table 1 "Inspection Schedule" with new version (2 pages); replace present Inspection Log with new version.

G. Contingency Plan

The Contingency Plan has been completely rewritten and copies are enclosed to replace the original version. The new edition has been circulated to the appropriate local authorities; copies of their receipts will be available if required.

SOLVENT RESOURCE RECOVERY, INC.

SRR ™

4301 Infirmary Road
P.O. Box 453
West Carrollton, Ohio 45449
(513) 859-6101

March 30, 1983

McKesson Chemical
136 Summit Ave.
Montvale, N.J. 07645

Attn: Donald Black

Re: Waste Disposal Quotation

Responding to your telephone request of today, I am pleased to quote the following.

To satisfy your requirement for RCRA Part B Permit, Closure Plan, Solvent Resource Recovery, Inc. will accept drum solvents at the following disposal rate.

Correctly identified drums	$35.00 per drum
Unidentified drums	$45.00 per drum
Drums with less than 50% solids	$50.00 per drum
Drums with more than 50% solids	$95.00 per drum

These prices do not include transportation cost. All shipments FOB our dock and all shipments properly manifested.

Should you require any further information, please feel free to contact me.

Sincerely,

A. H. Kohnen, P.E.
General Manager

AHK/lm

089-16(a)

MAR 0 9 1983

5HW-13

Ms. Laura Whitacre
Technical Assistance & Waste Management Section
Division of Hazardous Materials Management
Ohio Environmental Protection Agency
P.O. Box 1049, 361 E. Broad Street
Columbus, Ohio 43216

RE: McKesson Chemical Company
Bedford Heights, Ohio
OHD 071-107-791

Dear Ms. Whitacre:

Enclosed, for your information and use, is a preliminary technical analysis we have performed on the Part B application for the above-referenced facility. Application items that we believe need some clarification are as follows:

1) Item B-1-- A specific discussion of the types (e.g. SIC code) and sizes (e.g. annual waste volume) of customers served should be provided. This information would assist in our judgment of the adequacy of the waste analysis plan (e.g. frequency of applicant verification of customer-provided waste analyses).

2) Item B-2-- While a topographic map depicting 2' contours does not appear necessary relative to such a small waste storage area, a specific discussion of on-site drainage patterns should be provided. This would assist in our determining what would occur in the event of a major spill or contaminated rainfall runoff (e.g. would the flow be intercepted by a ditch or drain prior to reaching the adjacent property owner(s) ?).

3) Item C-1 -- Though the descriptions under this item were exceptionally thorough, our confidence in the information would be raised if several actual waste analyses (e.g. lab reports) were provided.

4) Items C-2b and C-2c -- A specific statement that the test and sampling methods proposed conform to Federal standards is desired here to round out the discussion.

5) Item C-2d -- Though "frequency of analysis" is addressed, frequency in terms of "time" should also be provided. We are unable to determine, even generally, how often analyses will take place (quarterly, annually ?).

089-13

6) Item F-5d -- The discussion is weak concerning the procedures used to ensure that incompatible wastes and materials are not placed in the same container (e.g. prior to delivery to this facility). This may not be a problem with the specific wastes involved, but it should be addressed more thoroughly than merely "encouragement of customers" to be careful in this regard. What is the likelihood, for example, of a drum of incompatible wastes exploding on-site?

7) Item G-1 -- Facility identification information should be added to the contingency plan, so that the plan is a separable, complete document.

8) Item G-3 -- Some specific discussion of what triggers the contingency plan would be desireable. Reference to an "imminent or actual contingency situation" is not very specific.

9) Item G-5 -- The locations of emergency equipment should be indicated on the site plan. In addition, there should be some discussion of the "capabilities" of the fire extinguishers and other equipment.

On the whole, we believe these deficiencies fall within the realm of "minor" rather than "major", as the application is exceptionally well-prepared. However, we believe they should be addressed along with any other items you and your district people feel need clarification or amendment.

If you have any questions, please call me at (312) 886-7443.

Sincerely,

James N. Mayka, P.E.
Technical, Permits, and Compliance Section
Waste Management Branch

Enclosure

cc: Tom Crepeau, OEPA

bcc: Kathy Homer, Ohio SIO
Ken Westlake, Ohio SS

5HW-13:Jim Mayka:pg:3-9-83

INITIALS	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WLRB CHIEF	WMD DIRECTOR
DATE	Pew 3/8/83	3/9/83						

MAR 0 1 1983

Mr. Donald Black
Eastern Regional Operations
and Safety Manager
McKesson Chemical Company
136 Summit Avenue
Montvale, New Jersey 07645

Re: McKesson Chemical Company
Bedford Heights, Ohio
EPA ID #: OHD 071-107-791

Dear Mr. Black:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. This letter is to notify you, as required by 40 CFR 124.3(c), that we have reviewed the application and have determined it to be complete. This determination means only that all items required by 40 CFR 122.25 have been addressed.

We now begin an "adequacy review", during which we analyze the technical aspects of the application, in-depth, in order to make a tentative decision to either prepare a draft permit or deny the application. We will be working cooperatively with the Ohio Environmental Protection Agency (OEPA) throughout the course of this review. Please understand that either, or both, of our agencies may request additional information from you, if it is necessary to clarify, modify, or supplement previously submitted material. Timely response on your part to any such requests should allow us to advise you of our tentative decision within 120 days of today's date.

Subsequent to that decision, either a draft permit or a "notice of intent to deny" will be publicly noticed and made available for public comment, with an opportunity provided for a public hearing. After the close of the public comment period, our Agency will issue a final permit decision. The timing of public notice, any hearing, and final permit decision by our Agency may be scheduled to coincide with any similar activities being conducted by the State of Ohio Hazardous Waste Facility Approval Board (HWFAB).

If you have questions at any time, please feel free to contact James Mayka of my staff at (312) 886-7443.

Sincerely yours,

	TYPIST	AUTHOR					
INITIALS							
DATE	2/28/83	3/1/83					

for
William H. Miner, Chief
Technical, Permits and Compliance Section
Waste Management Branch

KRS 3/1/83 — 2/1/83 — AHMD DIRECTOR

cc: Tom Crepeau, Ohio EPA
Peggy Vince, Ohio HWFAB

089-9

OhioEPA

Jim Mayka

February 17, 1983

Kathy Homer, State Implementation Officer
U.S. EPA, Region V
Waste Management Branch
230 South Dearborn Street
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management has conducted an administrative review of the Part B application submitted by McKesson Chemical Company. This application was reviewed for completeness pursuant to regulations published in 40 CFR 122.25, 124.3 and Part 264.

As indicated in the attached completeness checklist, several required items were not included. A brief discussion of these deficiencies is found on the checklist.

If you have any questions about our review, please call Laura Whitacre at (614) 462-8423.

Sincerely,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/lw/kjl

cc: Chuck Wilhelm, Chief, DHMM
Steve Tuckerman, NEDO
Tom Crepeau/file, P&MRS, DHMM
Tom Carlisle, TA&WMS, DHMM
Laura Whitacre, ES, DHMM
Ken Westlake, U.S. EPA, Region V
Karen Heyob, ES, DHMM

RECEIVED
FEB 23 1983
WASTE MANAGEMENT BRANCH

received 3-1-83

COPY 2

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43215-3878

Richard F. Celeste, Governor
Robert H. Maynard, Director

089-6

JAN 18 1983

Mr. Tom Crepeau
DHWM - OEPA
361 East Broad Street
P.O. Box 1049
Columbus, Ohio 43216

RE: Hazardous Waste Part B Permit Application

Facility EPA ID #: OHD 071-107-791 ✓
Facility Name: McKesson Chemical Company
Facility Address: Bedford Heights, Ohio

Dear Mr. Crepeau:

Enclosed is a copy of the Part B application and correspondence for the above referenced facility.

Your agency is requested to perform a completeness check of the application, prepare comments and draft a deficiency letter if appropriate. Please forward the filled-in checklist, review comments, and draft letter to this office by February 18, 1983. This will allow my staff 2 weeks to review the comments and issue the letter before expiration of the allotted 60-day review period.

Please contact Mr. James Mayka, the responsible U.S. EPA person at (312) 886-7443, if you have any questions regarding the application.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosure

bcc: Ken Westlake (5S)
Kathy Homer (5IO)

089-4

	TYPIST	AUTHOR			TPC CHIEF	WMB CHIEF	DIRECTOR
INITIALS	PW	JM		Banaszek	LOHHM		
DATE	1-14-83	1/14/83		1/17/83	1/18/83		

mr. 1-17-83

Foremost-McKesson
Chemical Group

McKesson Chemical Company
Eastern Region
136 Summit Avenue
Montvale, NJ 07645
201 573 9480

McKESSON CHEMICAL

December 28, 1982

Mrs. Kathy Homer
Region V USEPA
111 West Jackson Boulevard
Chicago, Illinois 60604

Reference: OHD071107791

Dear Kathy:

Under separate cover we are sending you an original and three copies of a Part B Application for our Bedford Heights, Ohio, branch to serve as a transfer station.

The Manager of this branch has changed since the original Part A was filed, and a new Form 1, with an original signature, is enclosed with this letter.

We look forward to our continuing collaboration.

With best wishes of the Season for you and yours.

Sincerely,

Donald Black

D. M. Black
Operations Department

DMB/jm

cc: Clifford Moll, Manager, Bedford Heights Branch
Karen Heyob, Ohio EPA

FOREMOST McKESSON

working draft

STATEMENT OF BASIS

McKesson Chemical Company - Bedford Heights
OHD 071-107-791

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

1. RCRA Activities

McKesson Chemical Company (MCC) is a wholly owned subsidiary of Foremost-McKesson, Inc. MCC operates a distribution facility in Bedford Heights, Ohio. McKesson Chemical Company is a nationwide distributor of various industrial chemicals. McKesson Envirosystems, another division of Foremost-McKesson Inc., operates a number of recycling plants across the country. The Bedford Heights facility consists of one 20,500 square foot building and approximately 110,000 square feet of yard area. The hazardous waste storage area will be a bermed concrete rectangle, 10' x 30' x 9". The facility will be used for the temporary storage of various spent chemical solvents prior to shipment off-site for recycling. There is no on-site treatment or disposal of hazardous waste subject to RCRA regulations.

2. Permit Actions Other Than RCRA

McKesson Chemical Company will not require other permits to satisfy any other Federal acts. The facility will not have an adverse effect on the historical, architectural, archeological, or cultural characteristics of the properties either listed or eligible for listing in the National Register of Historical Places.

B. PERMIT APPLICATION

The permit application cited herein is the December 1982 permit application, as amended on May 20, 1983.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR §124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a hazardous waste management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions, the permit will become effective immediately upon issuance of the permit. If comments received during comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Permit will be coordinated by both U.S. EPA and the Ohio Environmental Protection Agency (OEPA). At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This Section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

Permit Condition	Subject	Regulation (40 CFR)
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43, §264.112 & 264.343(d)
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h)& 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(l)(1)
I.D.11.	Certification of Construction or Modification	§270.30(l)(2)
I.D.12.	Anticipated Noncompliance	§270.30(l)(2)
I.D.13.	Transfer of Permits	§270.30(l)(3) 270.40 & 264.12(c)
I.D.14.	Compliance Schedules	§270.30(l)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(l)(6) & 264.56 (d)(i)(j)
I.D.16.	Other Noncompliance	§270.30(l)(10)

I.[illegible].17.	Other Information	§270.30(l)(11)
I.E.	Signatory Requirement	§270.11& 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Documents to be Submitted Prior to Operation	As Indicated in Draft Permit
I.H.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73, §264.15(b)

Permit Condition	Subject	tion (40 R)
II. GENERAL FACILITY CONDITIONS		
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	§264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards	§264.18
II.I.1.	Required Equipment	§264.32
II.I.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to the Contingency Plan	§264.54
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264.71, §264.72, §264.76, §270.30(1)(7), §270.30(1)(8
II.L.1	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(1)(9)

Permit Condition	Subject	Regulation (40 CFR)
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
II.N.	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
II.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148

Permit Condition	Subject	Reg (40
I...	STORAGE IN CONTAINERS	
III.A.	Waste Identification	§270.13(1)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

Permittee

McKesson Chemical Company
26601 Richmond Road
Bedford Heights, Ohio 44146

I.D. Number OHD-071-107-791
Permit Number

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to McKesson Chemical Company (hereafter called the Permittee), to operate a hazardous waste storage facility located in Bedford Heights, Ohio, on Richmond Road, at latitude 41 degrees 24' 45" and longitude 81 degrees 29' 01".

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264, 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the December 1982 permit application referenced in the Permittee's letter dated December 28, 1982 as modified by subsequent amendments dated May 20, 1983, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (See 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of
, and shall remain in effect until
, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51.

STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.15) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 June 1982, or an equivalent method as specified in the attached Waste Analysis Plan, Attachment I.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence storage of hazardous waste in the new containment system until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

Until such commencement, the Permittee shall continue to store any hazardous waste within the containment area utilized during interim status and shall fully comply with 40 CFR Part 265 with respect to that containment area.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Until such commencement, the permittee shall continue to store any hazardous waste in the containment area utilized during interim status, and shall fully comply with 40 CFR Part 265 with respect to the containment area.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Submitted Prior to Operation. No documents are required to be submitted prior to operation.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).

H. Location Standards. There are no location standards applicable to this facility.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV, as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.7[illegible].

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), (7), and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment V.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

F001 -- The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated flourocarbons; and sludges from the recovery of these solvents in degreasing operations.

F002 -- The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, and trichlorofluoromethane; and the still bottoms from the recovery of these solvents.

F003 -- The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alchol, cyclohexanone, and methanol; and the still bottoms from the recovery of these solvents.

F004 -- The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene, and the still bottoms from the recovery of these solvents.

F005 -- The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine; and the still bottoms from the recovery of these solvents.

The Permittee shall not, at any one time, store an amount of waste greater than 6,600 gallons in containers.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall construct within 60 days of the effective date of this permit, and maintain, the new containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment VI.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste. The Permittee shall only store wastes which are mutually compatible.

SIGNATURE PAGE

Signature: _____

Basil G. Constantelos, Director
Waste Management Division

Date: _____

RESPONSE TO COMMENTS
REGARDING THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
HAZARDOUS WASTE MANGEMENT FACILITY PERMIT ISSUED TO

McKesson Chemical Company
26601 Richmond Road
Bedford Heights, Ohio
U.S. EPA ID #: OHD 071-107-791

INTRODUCTION

This response is issued pursuant to 40 Code of Federal Regulations (CFR) Section 124.17, "Response to Comments", which states that U.S. EPA shall (1) specify which provisions, if any, of the draft permit have been changed in the final permit decision, and the reasons for the change, (2) describe and respond to all significant comments on the draft permit raised during the public comment period, or during any hearing, (3) include in the administrative record for the final permit decision, any documents cited in the response to comments, and (4) make the response to comments available to the public. If new points are raised or new material supplied during the public comment period, U.S. EPA may also document its response to those matters by adding new material to the administrative record.

The public comment period commenced on July 22, 1983, with a public notice in the Cleveland Plain Dealer. This notice requested public comments on the draft RCRA permit for McKesson Chemical Company, and announced a public hearing for August 25, 1983, at the Bedford Heights City Council Chambers, 5661 Perkins Road, Bedford Heights, Ohio. Written comments were accepted through September 12, 1983, the end of the comment period.

COMMENTS AND RESPONSES

No public testimony was offered at the August 25, 1983, public hearing, and no written public comments were received through the end of the comment period.

DETERMINATION

As part of the final permit decision, U.S. EPA has determined that several provisions of the draft permit should be modified, expanded and/or clarified. The following describes the provisions that have changed and the rationale for the changes.

Provision: Permit condition II.N., "Cost Estimate of Facility Closure."

Change/Rationale: The cost estimate for future closure of the waste management portion of the facility has been revised to more conservatively reflect the cost of removing waste off-site. Whereas the solvents being stored have current economic value due to recyclability, the revised closure cost estimate assumes the solvents must be disposed of as true waste materials, which is significantly more expensive. McKesson has provided U.S. EPA satisfactory financial guarantees to ensure that sufficient funds will exist for proper future closure of the waste management area. This change in the closure cost estimate provides additional protection for the environment.

Provision: Permit Condition III.E., "Containment."

Change/Rationale: This permit condition has been expanded to include, as an enforceable part of the permit, the operation and maintenance procedures for the waste containment area. These procedures, added to Attachment VI, are more specific, and more protective of the environment, than the general regulatory provisions of 40 CFR 264.175, "Containment." This permit condition has also been modified to require McKesson to construct the new containment system within 60 days of the effective date of this permit, or within 60 days of receiving all necessary State and local pre-construction approvals, whichever is later. The underlined clause has been added, so as not to place McKesson in a potential situation of constructing a concrete berm around their storage pad to comply with this permit, while simultaneously violating State and/or local laws. State and/or local approvals are expected shortly, and McKesson's current storage practices have posed no environmental problems throughout the Federal interim status period. Specific language concerning the manner in which storage must be carried out until construction of the concrete berm is completed has also been more appropriately added to this permit condition in lieu of its original placement in Permit Condition I.11.

In addition, the cover page of the permit has been re-formatted for purposes of clarity. The cover page now highlights the authorized activities, the applicable regulations, and the basis and signature of permit approval.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT I
WASTE ANALYSIS PLAN

McKesson Chemical Company
U.S. EPA FACILITY ID #: OHD-071-107-791

McKesson Chemical Company

Waste Analysis and Verification Procedures

(40 CFR Sec. 122.25(a)(3))

The following pages describes the standard Waste Analysis and Verification Procedures now in effect at those McKesson Chemical branches already permitted in the storage of hazardous wastes.

WASTE ANALYSIS AND VERIFICATION PROCE S

McKesson Chemical Company

1. Upon initial contact from a prospective customer who wishes to employ McKesson Chemical Company and McKesson Envirosystems' services to recycle a spent stream, a McKesson representative is either sent to the customer's location or makes contact with him to acquire a prepared Spent Material/Waste Product Survey form (copy attached along with preparation instructions). McKesson strongly urges the customer (who is the generator) to provide us with a physical and chemical analysis which he has either performed or has obtained from an outside laboratory.
2. The completed Spent Material/Waste Product Survey form and any laboratory physical and chemical analysis are returned to the respective branch which will be handling the generator's waste stream. A copy of the survey and any analyses are kept on file at the branch facility, while the original is mailed to McKesson Envirosystems, headquartered in Fort Wayne, Indiana, along with copies of any laboratory analysis.
3. McKesson Envirosystems will evaluate the data contained on the Spent Material/Waste Product Survey form and the analytical reports on the waste stream and determine if the recycling facility has sufficient information to properly manage the material. A sample may be required by McKesson Envirosystems before a decision is made as to whether to accept a particular waste stream and, if so, copies of the laboratory reports are forwarded to the McKesson Chemical branch facility before the material is picked up.
4. Once McKesson Envirosystems has made a determination that sufficient knowledge of a particular waste stream is on hand, and approval is given by the Environmental Engineer, Marketing Manager, and Corporate Manager of Refinery Operations, the McKesson branch is notified.

5. With this approval on hand, the McKesson branch will notify the generator that the branch is authorized to pick up the material in accordance with the following procedure:

    A. The generator completes an appropriate Hazardous Waste Manifest based on the Survey form and accompanying analytical data.

    B. A copy of the Manifest is supplied to the local McKesson branch and is checked.

    C. A copy of the Manifest, after its approval by Branch Management, is given to the truck driver and is to be in his possession until delivery of the material to the branch.

    D. The material to be picked up is compared to the listing on the Manifest by the driver. In addition, he:

        a. Evaluates the container for condition - scaled, with no apparent leaks.

        b. Locates the precautionary warning label, if required.

        c. Ensures that no other labelling or stencilling is on the container other than the Hazardous Waste label, including trademarks, original vendor names, and the like.

E. The driver also makes sure the Hazardous Waste Label on the drum is complete:

a. Generator name and address.

b. Contents.

c. Manifest number.

d. Proper shipping name.

e. E.P.A. ID number.

f. Accumulation starting date.

F. The driver picks up only that quantity and class of hazardous waste appearing on the Manifest.

6. Upon notice to McKesson Envirosystems that a McKesson Chemical branch requires pick up of an accumulated load of spent material, McKesson Envirosystems' headquarters in Fort Wayne, simultaneously forwards a copy of all data accumulated on a particular waste stream to the respective recycling facility for review and filing at that location so that this information is available before actual receipt of the waste stream.

7. At the time a shipment is received at the recycling facility, a measurement and recording of the volume received of a particular generator's stream is made. Verification is made that the count contained on the accompanying shipment manifest document corresponds to the number of containers received and that the lot numbers assigned by the McKesson Chemical branch handling (storing) the spent stream are accurate. A sample is drawn from the various drum utilizing a sampling tube which will ensure a homogeneous (cross section) representation according to the following schedule:

7. cont'd.

a. For ten or less drums in a particular generator's lot of a given product, all drums are sampled.

b. For more than ten drums in a particular generator's lot of a given product, a statistical sampling of 40% of all drums, but not less than ten drums, is taken.

The container samples are then taken and an aliquot representation is composited for analytical verification. The sample taken at the recycling facility is labelled and identified with the following information:

a. The manifest number.

b. The generator's E.P.A. identification number.

c. The proper D.O.T. shipping name as it appears on the hazardous waste label on the drum.

d. The E.P.A. hazardous waste code as it appears on the hazardous waste label on the drum.

e. The date on which the shipment is received.

f. The initials of the individual who took and composited the sample.

The drums are held in a specially designated and contained storage area where they are segregated according to generator and waste identification until the lab verification results are returned.

8. The composite sample of the received containers is taken to the on-site lab where gas chromotagraphic analysis is performed to ensure that the material is in fact one and the same as the description on the Spent Material/Waste Product Survey form, the manifest, the drum label, and any

lab reports which the generator may have provided. Based upon the results of the chromatographic analysis, further tests will be conducted as warranted. Once verification is made, the approval is given by the Plant Manager, or that individual's designee, for movement of the drums into the processing area.

9. Should a discrepancy become apparent during the verification analysis, the recycling center will contact the McKesson Chemical branch who will in turn contact the generator to inform him of the discrepancy. Based upon the findings of the lab and the contact with the original generator, the shipment of the material having the evidence of a discrepancy may be refused, or an alternate means of handling the shipment will be arranged with the original generator.

10. A copy of the gas chromatographic analysis is returned to the McKesson Chemical branch which was temporarily storing a generator's spent material. This copy is placed into the customer's file (original generator), which also contains a copy of the original Spent Material/Waste Product Survey form, any laboratory analytical reports, and any and all correspondence between any of the parties involved regarding that particular generator's waste stream.

The net result of the preceding is that all shipments of recyclable materials sent to one of the recycling facilities are verified by the latter before they are processed. This step not only verifies the economic value of the spent stream but prevents damage to the equipment and hazard to personnel due to unexpected ingredients in the solvent.

Section 1. General
Complete company name, address and zip code.
If generating plant is in a different location, please note.

Omit Product Code.

Section 2. Marketing
The accurate completion of this section has a direct effect c
A. Pricing
B. Method of pick up
C. The decision as to where the spent material will be p
D. The request for a sample.

Section 3. Physical Properties
Complete to your best ability
If the generator has any other analysis i.e. WR&R or Indepenc laboratory, please attach.

Section 4. Hazardous Properties
Under RCRA hazardous waste will meet 4 basic properties:

A. Ignitable Flash Point $<140^{\circ}F$ Actives, Hydrocarbons, Lacquer Thinners, and blends of these solve
B. Toxic Chlorinated and Fluorocarbons
C. Corrosive Acids, Caustics, PH ≤ 2 or >12.5
D. Reactive TNT Waste water, Sodium Metal

Describe the property relative to the waste stream.

Section 5. EPA-DOT Identification
EPA hazardous waste numbers can be found by using the attached listing. (Taken from CFR #40, 5-19-80)
Hazard codes describing the waste's properties listed in Section 4 can be found on the same listing.
DOT hazardous material descriptions in addition to their hazard class and identification (UN or NA) numbers are found in the Hazardous Materials Table 5-22-80. A copy of this table should be on file at each McKesson branch

Section 6. Chemical Composition
The basic components of the waste should be listed in this section along with their percentages of composition.
Again any other analysis reports on the stream should be attached.

Section 7. General
Any other information relative to the stream, or customer specifications on reclaimed and returned material, ie. drying, addition of virgin material, packaging should be listed here

Section 8. The generator must sign this survey form. Failure to do so will cause immediate rejection by McKesson Envirosystems.
Phone number, date filed, and federal EPA I.D. number must a be completed.

Foremost-McKesson
Chemical Group

McKesson Envirosystems Co.
127 West Berry Street
200 Commerce Building
Fort Wayne, IN 46802
219 424-1940

FOR OFF
USE ON

Spent Material / Waste Products Survey

McKESSON ENVIROSYSTEMS

Please provide all information requested below, then return this form to your local McKesson Chemical Representative.

COMPANY (1)	SIC NUMBER
MAILING ADDRESS	PRODUCT CODE

DESCRIPTION OF SPENT MATERIAL / WASTE PRODUCT (2)

INDICATE PROCESS WHICH GENERATES THIS SPENT / WASTE (BE SPECIFIC)

VOLUME	FREQUENCY			PACKING	
	PER MONTH	PER YEAR	ONE TIME	IN DRUMS	IN BULK

PHYSICAL PROPERTIES: (3)
PHYSICAL STATE AT 70°F (DATE OF LAB ANALYSIS_____)

SOLID _____ LIQUID _____ FLASH POINT _____
SEMI-SOLID _____ PH _____
SPECIFIC GRAVITY _____ % CHLORINE _____
% SULFUR _____ BTU PER LB/GAL _____

HAZARDOUS PROPERTIES:
DESCRIBE— (4)

EPA / DOT IDENTIFICATION:

EPA HAZARDOUS WASTE NUMBERS (5) _____ EPA HAZARD CODES _____

DOT HAZARDOUS MATERIAL DESCRIPTION _____

CHEMICAL COMPOSITION:

SUBSTANCE	MIN	MAX	TYP	SUBSTANCE	MIN	MAX	TYP
(6)							

GENERAL:

1. PLEASE PROVIDE LAB ANALYSIS IF HEAVY METALS, CYANIDES, PESTICIDES, CARCINOGENS OR OTHER TOXICS ARE INVOLVED.
2. PLEASE DISCUSS ANY OTHER INFORMATION WHICH MAY HELP McKESSON BE OF SERVICE: (7)

PLEASE ATTACH ANY ADDITIONAL HAZARD AND HANDLING INFORMATION TO THIS SHEET.

TO THE BEST OF MY KNOWLEDGE AND ABILITY TO DETERMINE THIS IS A COMPLETE AND ACCURATE DESCRIPTION OF THIS MATERIAL.

SIGNATURE (8)	TITLE	
PHONE NUMBER (INCLUDE AREA CODE)	DATE	EPA IDENTIFICATION NO.

McKesson Chemical Company

Waste Analysis Plan

(40 CFR Sec. 122.25(a)(3))

This facility of McKesson Chemical Company is seeking a permit to function simply as a short-term (probably less than a month) storage facility for a limited variety of spent organic solvents. These will be handled only in DOT-approved drums, and will usually have been picked up in small numbers from customers who had previously purchased the virgin material. Once a sufficient number of drums have been accumulated at the facility to make transport economically feasible they will be moved out-of-state for re-claiming (either New Jersey or Kentucky).

Each branch of McKesson Chemical Company organizationally is a financial entity unto itself — in other words, it is a small chemical business. Typical of such small chemical distributorships, which carry out no manufacturing processes, the branch has no laboratory facilities. It would be uneconomic and financially impossible to have technical personnel and to equip a laboratory for the limited amount of material being handled. Even the cost of outside analytical work would be prohibitive, especially in view of the fact that such analytical work would duplicate the effort subsequently carried out by the McKesson recycling facility.

On the other hand, the purpose of a profitable reclaiming business is thwarted unless the constituents of the spent solvent stream being handled are known accurately. To this end the McKesson reclaiming facilities in New Castle, Kentucky, and Newark, New Jersey, (McKesson Envirosystems Company) maintain and operate a sophisticated analytical laboratory. Consequently, a McKesson distributor branch is assured of knowing exactly the content of each spent

solvent stream being proferred by a customer (generator). A sample of a proferred stream of uncertain content is sent to New Castle or to Newark for analysis; in addition, a Spent Material/Waste Products Survey form (most recent revision appended) is prepared by the customer in connection with each proferred stream, and a copy of a formal chemical analysis is requested of the customer. Both are filed at the branch. The procedure followed is detailed in the accompanying Waste Analysis and Verification Procedure.

McKesson has an established policy that requires each customer to certify that recyclable solvents proferred to McKesson are only listed wastes (F001 through F005), and that they do not contain unacceptable materials. These unacceptable materials include such items as pesticides, known and suspected carcinogens, radioactive materials and poisons. With these restrictions, it is felt unnecessary to test for these products, although, if they were, the procedures outlined in Publication SW-846, "Test Methods for Evaluating Solid Waste" would be followed. The customer does provide assays of his listed wastes, usually including the process from which it derived (McKesson invariably knows the latter anyway because of its basic sales relationship with the customer). It should be noted McKesson has records of ongoing chemical and physical analyses of existing customers' materials resulting from its own analytical work at the recycling center.

In addition, all materials leaving the branch for recycling are shipped in the same container in which they arrived (unless, of course, container damage mandated a transfer).

Despite the reliance on another McKesson facility for actual chemical and physical analyses of the spent streams this McKesson branch handles, the branch recognizes its responsibility to inspect the drums received (264.13). As noted earlier, the branch has records of testing of products supplied previously by existing customers, and drums of spent solvent as they arrive are checked against manifest data which, in turn, are based on assay and analyses carried out previously by the laboratory of the recycling center. These inspections by the receiving branch's personnel are logged in accordance with the Inspection Schedule (122.25(5)).

A word is in order regarding parameters that are measured in order to handle the spent streams safely and to assure their economic potential:

PARAMETER	TEST METHOD	PURPOSE
Assay	Gas Chromatograph	To confirm identity and amount of recoverable component(s).
Specific Gravity	Balance	Useful in product identity; permits conversion of volume to weight.
Water	Karl Fischer Apparatus	Possible contamination.
Flash Point	Closed cup ASTM D56 or D93	Flammability danger.
pH	pH Meter	Danger of corrosion.

It should be noted that in many cases knowledge of exact compositions are not required — only that flammability is tested and that the product matches what was manifested. This reflects the fact that in taking a spent solvent from a customer and cleaning it by distillation, the subsequent product is usually sold by physical characteristics — not by chemical structure. Thus, in order to transport, store, and distill such spent material only a minimum of information about its makeup is required.

The McKesson recycling facility and its predecessor organization has been carrying out these analyses for about twenty years, and is therefore competent in the techniques of sampling — the taking of representative samples. Each recycling facility is extremely careful to know exactly what it is handling in order to prevent damage to its equipment (as from corrosion) and to prevent accidents (such as would result from inadvertent handling equitable materials).

All analyses required for characterization of a hazardous waste stream from a McKesson Chemical branch carried out by a McKesson Envirosystems laboratory — and subsequently filed at the McKesson Chemical branch — follow the analytical procedures defined in SW-846, "Test Methods for Evaluating Solid Waste".

Obviously, knowing the customer — the waste generator — is an important element of this process. The following page is an internal McKesson document depicting the sequence of approvals by McKesson management personnel prior to acceptance of spent streams from that generator.

WASTE GENERATOR APPROVAL

McKESSON CHEMICAL

Foremost-McKesson Chemical Group

McKesson Chemical Company

Vendor Information

To: Marketing & Product Management Home Office	From: Region	Date
Vendor Name		
Address		
City, State, Zip Code		
Telephone Number	Contact	
Request originated by		Date
Branch:		

Approvals

Approved Yes ☐ No ☐	District Manager	Date
Approved Yes ☐ No ☐	Regional Mktg. & Prod. Manager	Date
Approved Yes ☐ No ☐	Regional Vice President	Date
Approved Yes ☐ No ☐	Vice President, Mktg. & Prod. Management	Date

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT II
INSPECTION SCHEDULE

McKesson Chemical Company
U.S. EPA FACILITY ID #: OHD-071-107-791

McKesson Chemical Company

Inspection Schedules, Equipment Requirements, and Preventative Measures

(40 CFR Sec. 122.25(a)(5), 264.15, 264.174, 264.194, 264.254, 264.255, 122.25(a)(6)

As a result of McKesson Chemical's being only a distributor of chemicals (no manufacturing, no processing), any branch will employ a limited variety of equipment in its daily business. Those few pieces, plus particularly all equipment and apparatus involved with safety, do receive regular well-defined inspections routinely, and all are subject to preventive maintenance. The net result is a constant evaluation of all relevant equipment and its operation for possible malfunctions, structural deterioration, operator errors, and unintentional misuses which could affect human health or the environment.

Table 1 shows the items which are routinely inspected and the types of problems which could present themselves or cause an item to be nonfunctional. The items have been selected as those being important to the facility maintaining a safe working environment for the employees, and to being valuable in preventing a threat to the public and/or ecological systems.

Included in Table 1 is a listing of the frequency with which the items are inspected. It should be noted that in addition to these inspections which are routinely done by the branch personnel, McKesson Chemical Company has other Company personnel not stationed at the facility, conduct a "Safety Audit" of the operation on a quarterly basis. This policy has been in place since 1978 and entails either the facility's District Manager or a member of the Regional Operations Department Staff's visiting the branch for what typically is a full day to inspect and evaluate the facility in approximately 180 areas pertaining to safety and operating procedures. Examples of areas checked are:

In additon to container inspections being logged, similar documentation is undertaken for Company quarterly safety inspections, sprinkler system inspections (weekly), fire extinguisher inspections (monthly) maintenance checklist (as designated by specific area), and governmental inspections (as performed).

This facility of McKesson Chemical Company does not utilize tanks of any sort for the management of waste materials. Thus, the regulations pertaining to inspections and the logging of such inspections on this type of equipment is not applicable.

This facility likewise does not utilize waste piles as a means of managing wastes, and the regulations pertaining to inspections and the logging of such inspections are not applicable.

If McKesson Chemical Company personnel, upon a routine inspection, find that a condition is present of a non-emergency nature which requires some type of maintenance in order to bring that particular article into compliance with standards, it shall be that employee's responsibility either to bring the subject concern into compliance, or to bring it to the facility management's attention to correct the deficiency. All remedial actions are undertaken at the earliest possible time in order to alleviate potential for further deterioration of equipment, or to eliminate an unsafe condition which could pose a threat to health or the environment.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to be, the employee shall immediately initiate

1. Office area
2. Drivers' records
3. Fire protection
4. Maintenance
5. Compliance with OSHA, DOT, all applicable rules and regulations
6. Security
8. Warehouse & dock
9. Yard area
10. Transportation
11. Physical layout & equipment
12. General recordkeeping and control
13. Compatibilities of stored materials.

Inspections of the hazardous waste container storage area will be conducted as outlined in Table 1. Results and documentation of any remedial actions which might be required will be recorded on an inspection log sheet similar to the one found following this narrative and entitled "Inspection Log Form". Information to be included on the log sheet shall include the item inspected, date and time of inspection, name of inspector, remedial action (if necessary), and supervisor's signature. McKesson Chemical Company has also developed the form entitled "In House Container Inspection Checklist", which is included immediately following the Inspection Log Form. Included on this form is a listing of areas which should be reviewed pertaining specifically to the area of container management. The inspector is required to check the status of each item and make a decision as to acceptable or unacceptable. On the lower portion of the form, are action codes for remedial activities which might be necessary to implement if conditions are found which might necessitate some action. Upon discovery, the appropriate personnel shall ensure that the proper actions to remedy an unsafe situation are undertaken. Any remedial actions shall be noted and kept on file with appropriate reports made, if necessary.

remedial action, and notify the appropriate emergency coordinator who shall carry out his/her actions as outlined in the Contingency Plan. As outlined within the Contingency Plan, in the event of a release of materials, it shall be the objective to contain, isolate, clean-up, and decontaminate the affected area with the utmost concern for minimizing risk to Company workers, the public, and the environment. The clean-up material must then be properly disposed of, and necessary documentation and reporting undertaken.

Inspection logs are maintained and kept at the facility by the Operations Manager. The format of the inspection log is included at the end of this narrative and is to be maintained at the facility for a minimum of 3 years from the date of inspections. Any extraordinary occurrences such as a waste release or fire requires a written report which shall be kept on file at the facility, as well as being forwarded to the appropriate agencies and Company personnel as outlined in the "Contingency Plan" section.

McKesson Chemical Company does not request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this section of the regulations are to be complied with.

Specific discussion pertaining to internal and external communications capabilities, the internal alarm system, emergency equipment present on-site, fire control equipment present on-site and training in its use, is discussed either in this section accompanying "Contingency Plan".

The telephone system at this facility provides the main internal as well as external means of communication. A designated alarm system is utilized by

branch personnel to act as an alert system for emergency situations with instruction and drills conducted on a routine basis.

Emergency equipment maintained at this facility is listed in the Contingency Plan.

Adequate water is provided at this facility by means of fire hydrants as shown on the facility site plan. The building itself is protected by a sprinkler system with an automatic alarm system hookup, although no waste materials are stored within the building.

Table 1

McKesson Chemical Company

Inspection Schedule
(To be kept at Facility)

Area/Equipment	Specific Items	Types of Problems	Frequency of Inspection
Container Storage Area (Secondary Containment)	General Area	Leaks, spills	Daily
	Container placement and stacking	Aisle space	Weekly
	Sealing of containers	Open bungs, lids	Weekly
	Labelling of containers	Improper identification Date missing illegibility	Weekly
	Base	Cracks, erosion	Daily
	Berm	Cracks, deterioration	Daily
	Warning signs	Damaged	Weekly
	Debris & refuse	Aesthetics	Weekly
	Accumulated liquid	Contamination	Daily, and confirm after precipitati
Security Devices	Facility fence	Corrosion, damage	Weekly
	Main Gate	Corrosion, damage, non-functioning	Weekly
Loading, Unloading Areas	Surface areas	Deteriotation spills	Daily
	Dock bumpers	Damage	Daily

Area/Equipment	Specific Items	Types of Problems	Frequency of Inspection
Safety & Emergency Equipment	Emergency shower & eye wash	Water pressure, leaks drainage	Weekly
	Industrial absorbent	Out of stock	Monthly/ as needed
	Overpack drums	Out of stock	Weekly
	Face shields	Broken or dirty	Monthly/ as needed
	Chemical cartridge respirators with cartridges for organic solvents	Spent solvent, seals	Monthly/ after each use
	Portable pump	Power, clogging	Monthly
	Fire extinguishers	Recharging	After each use
	Fire alarm systems	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	Emergency lighting system	Battery failure	Per NFPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing	Holes, wear & tear	As used
	Decontamination wash room	Water pressure, leaking drainage	As used
	Forklifts	Brakes (includes parking), tires (pressure), horn, lights, hoist, tilt, forks, steering, water level rad/batt., engine oil level, hydraulic oil leak	Daily

McKesson Chemical Company

In House Container Inspection Checklist

A. Location	YES	NO	Recommended Action
1. Waste materials properly segregated according to McKesson compatibility storage program.	___	___	_____
2. Ignitables (flammables, combustibles) located 50 feet from property lines.	___	___	_____
3. Aisles provided for emergency access.	___	___	_____
B. Container Condition			
1. All containers sealed.	___	___	_____
2. Any leaking containers.	___	___	_____
3. Any containers swollen or bulged.	___	___	_____
4. Any containers concaved due to vacuum building up.	___	___	_____
5. Any containers with extreme corrosion	___	___	_____
6. All containers properly labelled and identified.	___	___	_____
8. All containers have lot number	___	___	_____
9. All containers compatible with products stored in them.	___	___	_____

Inspector: _____ Date: _____

I have reviewed this report and certify all storage is in satisfactory condition

Supervisor: _____ Date: _____

Recommended Action Codes

A - Effect McKesson compatibility program

B - Effect container receiving maintenance procedure

C - Effect container transfer procedure

D - Effect spill control procedure

I certify that the above recommended action has been taken on:

Date: _____ Storage is now satisfactory.

Supervisor: _____ Date: _____

INSPECTION					RESULTS		
SUBJECT	DATE	TIME	INSPECTOR	OBSERVATIONS	REMEDIAL ACTION REQUIRED	DATE COMPLETED	INSPECTOR

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT III
TRAINING PROGRAM

McKesson Chemical Company
U.S. EPA FACILITY ID #: OHD-071-107-791

McKesson Chemical Company

Personnel Training

(40 CFR Sec. 122.25(a)(12); 264.16)

The management structure of a McKesson Chemical branch is headed by a Branch Manager, to whom report a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Regional Office (Montvale, New Jersey, in the present case), who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee, he/she is assured a formal teaching exposure which is then documented in his record.

All this training detail is routinely applied to McKesson employees in line with their daily exposure to hazardous chemicals and solvents - corrosive, flammable, combustible, oxidative. The subjects covered in this training for hazardous materials include:

Physical Handling of Chemicals

- Storage
- Compatibilities

Accident and Emergency Procedures

Safety Rules and Regulations

Housekeeping

The duties, responsibilities, and qualifications for these three management positions involved in hazardous waste management follow:

McKesson Chemical Company

Personnel Training

(40 CFR Sec. 122.25(a)(12), 264.16)

Position Title: Branch Manager

Responsibilities and Duties -

- Facility Emergency Coordinator.
- Responsible for selection of personnel and supervision of overall personnel training programs which includes proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan implementation, etc.
- Supervises the facility's ongoing safety program which includes the conducting of monthly safety meetings.
- Works in conjunction with the Regional Office personnel (Montvale, New Jersey) in assuring the proper attainment of permits and licenses from local, state, and federal agencies.
- Supervision of branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customers who wish to utilize the Company's waste handling capabilities. Assure that customers and branch has appropriate permits and that all necessary and required data as set forth in the regulations and Company procedures is adhered with and present at the location for proper management of materials.

Responsibilities and Duties cont'd.:

- Addresses and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contigency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High School Graduate - College desirable.
- 3 - 5 years sales or sales management experience with supervisory responsibilities.

Personnel Training

McKesson Chemical Company

Position Title: Branch Operations Manager

Position Responsibilities -

1. Supervision of overall operation and maintenance of physical facilities involved with hazardous waste, pick up and storage.
2. Maintains physical aspects of facility compliance with RCRA and related permits.
3. Maintains standards of performance of drums and warehousemen in hazardous waste - related activities.
4. Maintains operating logs, maintenance records, monitoring records, inspection records, and all other required records.
5. Schedules all maintenance and repairs to structures and equipment related to HWM facility.

Experience and Qualifications -

- High School Graduate.
- 1 - 2 years experience or training in transportation or handling of hazardous materials, and warehousing activities. Supervisory experience desirable.

PERSONNEL TRAINING

McKesson Chemical Company

Position Title: Branch Administrative Manager

Position Responsibilities -

1. Maintains inventory log of hazardous wastes - sources, lot numbers, purchase orders, quantities.
2. Creates manifests for shipments of hazardous waste to recycling facility.
3. Overall supervision of office activities which includes proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
4. Notifies Branch Manager of emergency situations and may act as an alternate emergency coordinator in his or the Branch Operations Assistants absence.

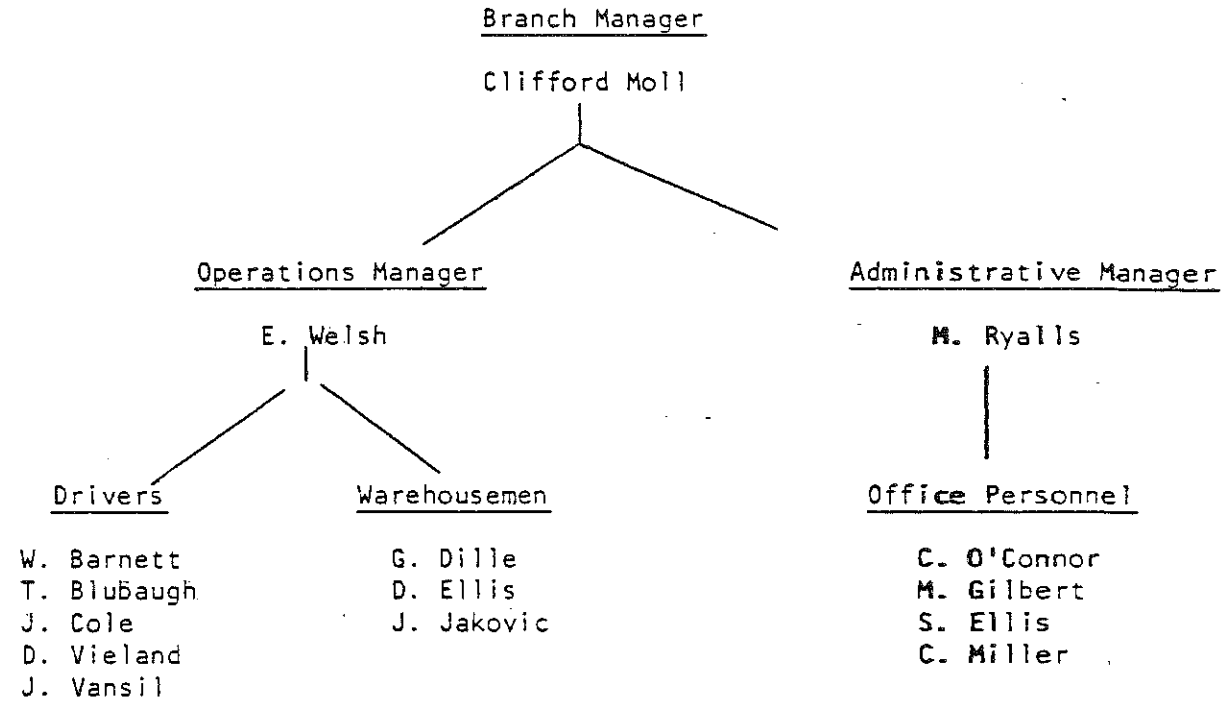
Experience and Qualifications -

- High School Graduate.
- 1 - 2 years in office related work with supervision experience desirable.

McKesson Chemical Company

Personnel Training

In the case of the Bedford Heights, Ohio, branch, the relevant organization chart is outlined below:



McKesson Chemical Company

Personnel Training

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by the Branch Manager and the Regional RCRA Coordinator on all facets of hazardous waste management. Responsibilities for hazardous waste management would not be delegated until such training is completed.

All three of these managers has attended a McKesson Chemical Company hazardous waste training session conducted by Dr. Donald M. Black, formerly Regional Operations and Safety Manager who is now full-time RCRA Coordinator for the Eastern Region of McKesson Chemical Company composed of sixteen facilities in eight states and five EPA Regions concerned with operation as a storage facility. Supplementary training concentration on the transport and manifest aspects of hazardous waste management is carried out by Mr. R. W. Von Dreau, the Assistant Regional Operations and Safety Manager of the Eastern Region. The overall training programs receive input from the Technical Director, Legal Department, Finance and Insurance support group in the Company's Home Office in San Francisco.

McKesson Chemical Company

Personnel Training

McKesson Chemical Company has developed the appended training outlines. Warehousemen and truck drivers attend hazardous waste training programs together. Copies of these training outlines are on file at the facility for use in the training or review of the actual employees which fall into the appropriate classification.

Included in the employees training program are sections providing instruction and indoctrination of all areas as outlined in these training guides as appropriate for the individuals job responsibilities. Specific sections are included in these guides which address the use, repair, inspection, and monitoring of safety equipment which may be required to be utilized in routine job functions as well as in emergency situations. Maintenance of other facility equipment is also covered in these outlines. Emergency plans and Contingency Plans are reviewed as well as necessary operating procedures to comply with Company and regulatory standards.

Key personnel are trained in similar areas of McKesson's business depending upon their area of responsibility. The training of such personnel is supplemented by staff personnel training sessions at the facility, Company conducted seminars, or visits to another Company site to work with experienced personnel holding a similar job position.

New employees filling a position at the facility which will be involved in hazardous waste management and/or handling shall be trained in all necessary facets hazardous waste management as outlined in 40 CFR 264.14 within six months of their employment or assignment to the facility. Employees which have not been fully trained in all appropriate sections pertaining to hazardous waste management shall not be allowed to work unsupervised until such

training is completed.

McKesson Chemical Company's policy is to conduct monthly safety meetings at all facilities. Included topics typically revolve around appropriate use of safety equipment, safe material handling and transport, emergency procedures, etc. Emergency drills are conducted on a six month interval to reinforce job assignments and procedures. Annual hazardous waste handling review sessions shall be conducted as required under the regulations.

McKesson Chemical Company

Personnel Training

Hazardous Waste Transport

1. EMERGENCY ACTION: In the event of an on-the-road spill or other emergency, the driver will follow these procedures:

   A. Remain with the unit and warn all pedestrians and motorists to stay away from the spill area, pointing out to them the danger involved and have someone call the police or fire department.

   B. Upon the arrival of the police or fire department, the driver will inform them of what kind of product has been spilled and request the area to be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury.

      The driver will request the police or fire department to protect the area while the driver reports to the company Emergency Coordinator (listed below in order of calling).

Name:	Walter R. Landry
Address:	27 Mayer Drive
	Suffern, NY 10901
(Home):	(914) 368-1898
(Office):	(201) 573-9480

Name:	Donald M. Black
Address:	11 Horton Lane
	New Canaan, CT 06840
(Home):	(203) 966-8670
(Office):	(201) 573-9480

Name:	Ronald W. Von Dreau
Address:	RD #1 Box 134-C
	Salisbury Mills, NY 12577
(Home):	(914) 496-6894
(Office):	(201) 573-9480

Name:	Alberto Rodriguez
Address:	347 Hudson Street
	Cornwall-on-Hudson, NY 12520
(Home):	(914) 534-8488
(Office):	(201) 573-9480

   C. The Emergency Coordinator will gather the information from the driver and contact the nearest appropriate Emergency Response Agencies and Emergency Response Contractor and provide the following information:

      1. Name of person reporting the incident.
      2. Name, address, and I.D. number of the transporter.
      3. Phone number where person reporting can be reached.
      4. Date, time, and location of the incident.
      5. Mode of transportation and type of transport vehicle.
      6. Brief description of the incident.

C. cont'd.

7. For each waste product involved provide:

   a. Name and I.D. number of generator.
   b. Product shipping, hazardous class, and UN or NA number.
   c. Estimated quantity of material spilled.
   d. If possible, the extent of contamination to land, water, or air.

8. Shipping name, hazard class, and I.D. number of any other material carried.

Emergency Response Agencies:

1. Ohio EPA Emergency Response Team	1-(800) 282-9378
2. U.S. National Response Center -	1-(800) 424-8802
3. U.S. Environmental Protection Agency -	1-(202) 655-4000
4. U.S. Coast Guard -	1-(202) 426-2675
5. CHEMTREC -	1-(800) 424-9300

Depending on the incident's geographical location, the following will be contacted:

1. County Health Department
2. Local Police
3. Local Fire Department
4. Local Municipality

D. Specific actions to be taken at the scene of the spill are:

1. Containment - The critical problem is to prevent any spilled liquid to escape into the ground or into a storm or sanitary sewer. A barrier is erected immediately to prevent such leakage, using whatever material is at hand - even a dirt curb to prevent spreading of the spill.

   Simultaneously, the source of the spill or leak is located and controlled - a drum plugged or taped, or even turned upside down, for example.

2. Cleanup - With containment effected and the spillage source controlled, cleanup is the next step. If the leakage is contained on an impervious paved surface, material is absorbed onto a suitable substrate sand, diatomaceous earth, or any of a number of commercial oil-absorbent inert materials, for example. If the spillage has reached earth, all contaminated dirt is collected into drums or bags for disposal. Such disposal is under tightly controlled circumstances - at

D.

2. Cleanup cont'd. -

An E.P.A. approved site or by an approved waste disposal method.

In addition to contaminated absorbents, dirt, or the like as noted above, damaged containers also present a disposal problem. All McKesson branches posses "Recovery Drums" - special oversize metal drums that will easily hold the standard 55 gallon drum used universally by the chemical industry. If the local McKesson branch does not have the facilities to dispose of the damaged drum and its partial contents, it is transported by a McKesson truck to a larger McKesson branch with the proper facilities to handle the damaged drum and its contents.

II. EMERGENCY EQUIPMENT: In order to carry out the preceding steps, emergency equipment is available at two sources.

A. The transport unit itself carries the following:

1. Rubber gloves
2. Rubber apron
3. Rubber boots
4. Full face canister type respirator
5. Face shield, safety glasses, and goggles
6. Plastic sleeves
7. Polyvinyl clothing (jacket and pants)
8. First aid kit
9. Eye wash solution

B. There are three McKesson branches located in Columbus, Cincinnati and Dayton, Ohio to provide a support service for an episode in Ohio. Additional emergency equipment is available at all these locations.

Safety Equipment

2 - Butyl rubber acid suits (top, trousers, and hood)
2 - pair rubber boots
6 - pair gauntlet rubber gloves
6 - pair canvas gloves
4 - pair goggles
4 - face shields
4 - hard hats and liners
2 - 10# ABC fire extinguishers
4 - emergency reflective triangles, first aid kit
2 - canister masks with required canisters
1 - 30 minute air pack with back up tank, neutralizer solution/portable system

B.

Safety Equipment cont'd

3 - flashlights (6v)
4 - "No Smoking" highway signs

Tools/Miscellaneous

screwdrivers
hammers
channel lock pliers
needle-nose pliers
linoleum knife
½" chisel
pipe wrenches (24", 18")
crescent wrenches (12", 10", 6")
bung wrenches
assorted bungs
duct tape
lead wool
stainless steel screws (assorted sizes) with rubber gaskets
sheet rubber and teflon
banding and banding tool
box wiping rags
transfer pump (with boron tub
100" extension cord
bags of sand and lime
recovery drum (65 gallon)
2' - 5' spade shovels
(Note: Chlorine emergency kits and related items may be required in particular instances)

C. All emergency equipment is inspected weekly and the inspection documented:

First aid kit for depletion of supplies
Protective clothing for rips, holes, and tears
Eyewash solution for level of liquid
Fire extinguishers for content level
Air pack for content (pressure)
Flashlights for "life"
Tool check for depletion of supplies or absence of an individual item
All other items such as absorbent materials, recovery drum, rope, tape, shovels, sand and lime, and extension cord for presence

Emergency Contractors - Ohio

Robert Rose & Sons, Inc. Grafton, Ohio	(216) 748-2171
Chemical Waste Management, Inc. Columbus, Ohio	(614) 457-7090
Solvent Resource Recover, Inc. West Carrollton, Ohio	(513) 859-6101
O. H. Materials Co. Findlay, Ohio	(419) 423-3526

III. FOLLOW-UP PROCEDURES: Two steps remain once the immediate emergency aspects of a spill have been taken care of:

A. Decontamination - A truck or trailer exposed to a spill or leak will be taken to an authorized tank truck washout station where it will be steam cleaned.

Equipment will be decontaminated in the following manner:

Each item used will be placed in an open head container and thoroughly rinsed with water. The residue or wash water will then be neutralized and drained into a tight head container sealed and disposed of in accordance with Federal and State regulations at an authorized disposal site.

Clothing thought to be contaminated will be placed in an open head container and thoroughly rinsed with water. The residue or wash water will then be neutralized and drained into a tight head container, sealed, and disposed of in accordance with Federal and State regulations at an authorized disposal site. If clothing has been seriously ripped or torn, it will be cleaned and then discarded.

B. Notification - The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Burea, Washington, D.C. 20590 will be notified, in writing, of the occurrence and nature of the incident and will send a copy to the New Jersey Department of Environmental Protection.

IV. TRAINING PROGRAM: In preparation for handling hazardous materials and hazardous wastes, all drivers and warehousemen receive approximately six hours classroom training conducted by Regional Office personnel, followed by refresher training by local management at regular scheduled (at least monthly) Safety meetings. In addition to the above, an annual Regional meeting is held to educate further each Branch Operations supervisor on changes in regulations.

The following is a list of classroom training provided to all branch personnel responsible for the handling and storage of Hazardous Waste:

1. Hazardous waste manifesting
2. Container receiving and maintenance
3. Container inspections
4. Container transferring
5. Container pick-up checklist
6. Reuse of containers for Hazardous Waste
7. Emergency response equipment
8. Emergency procedures
9. Hazardous waste labelling
10. Product compatibility
11. In-house maintenance checks
12. Emergency spills

Since much of the drivers' actions involve hazardous materials, including hazardous wastes, their instructions specifically include:

1. Inspection of their vehicles before and during trips
2. Driving rules

IV. TRAINING PROGRAM cont'd.:

3. Knowledge of safety and health hazards of products carried (i.e., flammable, corrosive)
4. Actions to be implemented in case of spills, accidents, or other emergencies involving hazardous materials and hazardous wastes

A copy of the Index of McKesson's Drivers' Training Manual is appended, as well as copies of the sign-off sheets signed by McKesson drivers receiving the training described above.

INDEX

Information complied from:

1. Professional Motor Transport Activities, Inc.
2. National Safety Council
3. Interstate Commerce Commission

I HAVE ATTENDED A TRAINING PROGRAM CONDUCTED ON _____ COVERING THE D.O.T. REGULATIONS LISTED BELOW. I ALSO UNDERSTAND MY RESPONSIBILITY AS AN EMPLOYEE OF McKESSON CHEMICAL COMPANY, TO COMPLY WITH THESE REGULATIONS TO THE BEST OF ABILITY:

A. VEHICLE INSPECTION

B. HOURS OF SERVICE

C. COUPLING

D. UNCOUPLING

E. DRIVER RULES

F. EMERGENCY PROCEDURES

G. GENERAL FIRST AID

H. DRIVING AND OPERATING CARGO TANKS

I. STATIC ELECTRICITY

J. FLAMMABLE LIQUIDS

K. TOP LOADING OF FLAMMABLE LIQUIDS

L. BOTTOM LOADING OF FLAMMABLE LIQUIDS

M. ACIDS AND CORROSIVES

N. ACID SAFETY EQUIPMENT

O. ACID LOADING

P. ACID DELIVERIES

Q. ACID FIRST AID

R. ACID SPILL PROCEDURES

I ALSO UNDERSTAND THAT IT IS MY RESPONSIBILITY TO READ AND COMPLY WITH THIS PROGRAM, AND ALL STATE AND FEDERAL REGULATIONS.

BRANCH _____ SIGNED _____

DATE _____

I HAVE ATTENDED A TRAINING PROGRAM CONDUCTED ON _____ COVERING THE D.O.T. REGULATIONS LISTED BELOW. I ALSO UNDERSTAND MY RESPONSIBILITY AS A EMPLOYEE OF McKESSON CHEMICAL COMPANY TO COMPLY WITH THESE REGULATIONS TO THE BEST OF MY ABILITY:

1. Hazardous Materials/Hazardous Waste Regulations.
2. Vehicle Placarding Regulations.
3. Product Compatabilities.
4. Drivers Regulations.
5. Bills of Lading/Shipping Papers/Hazardous Waste Manifests.
6. Loading and Unloading of H/M and H/W.
7. Cintainer Labeling.
8. Handling of Empties.
9. Emergency Procedures.

    A. On the dock.
    B. In transit.

SIGNED _____

DATE _____

I FURTHER UNDERSTAND AS THE DRIVER, I HAVE THE FINAL RESPONSIBILIT TO MAKE SURE MY LOAD MEETS THE REQUIRED REGULATIONS.

SIGNED _____

DATE _____

McKesson Chemical Company

Personnel Training

Relevance of Training to Job Position -

All operating and management personnel at all McKesson branches have always been formally trained in the aspects of the handling and management of hazardous materials their positions impinge upon. With the advent of McKesson's entry into the recycling of hazardous wastes, such formal training has required only an extension of subject matter to include hazardous wastes, since the latter are invariably only used ("spent") versions of the original hazardous materials already received, stored, and distributed.

Examples are McKesson's truck drivers, who receive formal periodic training on truck inspection, maintenance, DOT rules and procedures, emergency and clean-up procedures, and so on. Branch management is trained on requirements of hazardous waste containment, inspections, logs, inventory control, and so on. In other words, training is tiered toward the specifics of the position and its interface with hazardous waste.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT V
CLOSURE PLAN

McKesson Chemical Company
U.S. EPA FACILITY ID #: OHD-071-107-791

McKesson Chemical Company

Closure and Post-Closure Plans

(40 CFR Sec. 122.25(a)(13), 264.111 - 264.120, 264.78, 264.197 264.258, 122.25(a)(14), 122.25(a)(15), 264.142)

This section outlines the steps which the subject McKesson Chemical Company storage facility will follow in a closure situation in order to comply with applicable sections as outlined in the Resource Conservation and Recovery Act.

Because this facility functions as only an accumulation and transfer point for containerized spent solvents destined for recycling at another Company owned facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this activity is the sole reason for McKesson's being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility. For this reason, partial closure will not be addressed.

It should be further noted that because of the nature of the activity at this facility, that accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility, a post-closure plan will not be required because materials are being continually removed from this facility; in a closure situation, all materials would be removed in a similar fashion as practiced in routine day-to-day business.

McKesson Chemical Company will maintain a copy of this closure plan at the facility. The Company is aware that should this facility contemplate

BH

closure of the site, the EPA, Regional Administrator, and the comparable state agency must be notified at least 180 days prior to the date that the Company closes the facility.

McKesson Chemical Company will continue to operate business at this facility as long as it is deemed economically viable by the Company, and so long as its operation is otherwise permitted by applicable law. The Company is thus, at this time, unable to specify anticipated date of closure.

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both McKesson Chemical Company and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved closure plan.

Procedures developed by McKesson Chemical Company for managing waste materials are designed to ensure the facility's compliance with applicable laws, and to eliminate any necessity for further maintenance or control to prevent threats to human health or the environment. As outlined in the section entitled "Secondary Containment System Design and Operation", any evidence of unintentional leakage and subsequent containment will be sampled and analyzed to determine the specific contaminant and degree of clean up necessary. All contaminated materials will be removed and disposed of at a permitted disposal facility. The containment area shall be regraded to the original design in the event of surface material removal. The container(s) which indicate release of material shall be found, segregated, and handled in the proper manner to alleviate further release of material in accordance with Company procedures. The incident shall be reported and documented as appropriate based upon severity

and circumstances.

Due to the nature of McKesson Chemical Company's involvement in hazardous waste management, it becomes extremely difficult to be specific on the maximum quantities and types of material which would be on hand in a closure situation. Becuase McKesson Chemical Company is involved in the commercial recycling of various halogenated and non-halogenated solvents from off-site generators, the make-up and quantity of the materials which would be on hand at any time at this facility is difficult to predict with foolproof accuracy. Factors such as economic conditions, seasonal trends, and market growth will impact a particular generator's rate of use of materials, and thus affect the amount of materials shipped to this location for temporary storage and eventual recycling.

In no case, will this facility store more than 110 55 gallon drums at any one time. In the majority of cases, the maximum number of containers held at any one time will be below this quantity. Under the typical mode of operation at this facility, when a full truckload quantity of material is accumulated (typically 70 - 80 drums), it will be shipped to the recycling center. The reason for the higher maximum quantity is to facilitate peaks in shipments of spent materials from generators, scheduling requirements, etc.

In the event that McKesson Chemical Company made an assessment that it were to initiate closing of this site as a hazardous waste storage facility, we are aware of the required 180 day notice period required by the EPA. In the event that closure of this facility were to be undertaken, notices would be sent to present generators employing our services to inform them of our pending discontinuation of receiving their waste materials. All materials shall be removed from the site within 90 days of receipt of the final volume of

waste and total closure activities will be completed with 180 days as required as a maximum.

Once formal approval of the planned closure procedures are received from the agency, the anticipated total time required to schedule trucks into the facility, load up all drummed material, and clean (if required) the containment area is a maximum of ten days. Although all inventory in storage at the time of closure would be presumed to be material destined for recycling, for computations of this closure plan we are assuming the inventory at closure will need to be disposed of. If, in fact, the waste inventory is capable of being recycled, such a mode of operation would be undertaken and the refined material could be sold through another of McKesson Chemical Company's distribution branches. Based upon this type of dealing with the materials on hand at the time of closure, the cost of closure would be greatly reduced because of the economic value realized from the sale of the refined material. Regardless, we have taken a "worst case" posture in calculating the cost of closure by assuming disposal.

McKesson Chemical Company does not foresee nor anticipate the need for requesting any extensions for closure time for this facility.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination were necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontamination material could be shipped along

with the other inventory for disposal. For purposes of this closure calculation, we are assuming a worst possible situation in calculating decontamination necessity. Decontamination would be accomplished by utilizing a pressurized steam cleaning unit.

All waste and waste containers will be disposed of through McKesson Envirosystems. As mentioned earlier, we would fully anticipate all waste items in storage at closure to be capable of being recycled, but for purposes of this calculation we are assuming that materials would be transferred to McKesson Envirosystems. No pretreatment would be required before material were readied for shipment. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. At most, a simple rinse-off utilizing the pressurized steam cleaning equipment would be necessary of the forklift.

It should be noted that McKesson Chemical Company at this location, does not have tanks which are utilized for the management of waste materials and thus, shall not be required to provide details of closure for such.

McKesson Chemical Company likewise does not have waste piles present at this location and thus, is not required to provide details of closure.

This closure plan and cost estimate will be kept on file at the McKesson facility. It shall be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It shall be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published index's available.

Because McKesson Chemical Company at this location functions only as a hazardous waste storage facility, notation is not necessary in the deed to inform potential purchasers of restrictions.

Following is a formal Closure Plan and calculations showing how the closure cost for the facility was calculated. Although this latter figure is valid, it may be construed as being unrealistically low - but even an increase by an order of magnitude (10X) would be adequately covered by Foremost-McKesson's financial assurance.

CLOSURE PLAN

Facility I.D. Number OHD071107791

Owner or Operator: McKesson Chemical Company
Division of Foremost-McKesson, Inc.

Address: 26601 Richmond Road

Bedford Heights, OH

Telephone: (216) 292-7500

McKesson Chemical Company's major business is that of nationwide distribution of organic and inorganic chemicals. It also provides various services to it's customers, which may include picking up and transporting drummed materials of wastes to central recycling facilities. This may, at times, require temporary storage at our facility of some drummed materials in order to accumulate full truckloads.

1. Facility Conditions

A. General Information:

The facility size at this location is 20,500 sq. ft. of which only a small portion (e.g., loading docks) is used for handling of waste products which are accumulated from outside generators, and are destined for recycling once full truckloads are acquired. Waste storage is accumulated in the area outside the building, designated on the Layout Diagram. All unloading area floors are of impervious concrete. The designated storage area is made of impervious concrete. Total area utilized for waste storage is approximately 10 feet by 30 feet.

Fifty-five (55) gallon drums are the only storage method used. Drums are placed on wooden pallets (four (4) per pallet) and set within the containment area on the same pallet to minimize handling and potential spills.

The types of waste stored at this facility fall mainly into the following categories:

E.P.A. WASTE NO.	DESCRIPTION
F001	Spent halogenated solvents used in degreasing.
F002	Spent halogenated solvents.
F003	Spent non-halogenated solvents.
F004	Spent non-halogenated solvents.
F005	Spent non-halogenated solvents.

It should be noted that this facility only accumulated these items from outside generators for storage until a truckload quantity can be built up to make it economically feasible to ship to a Recycling facility. None of the above mentioned items are generated as a waste on-site.

B. Maximum amount of waste inventory is 120 (55) gallon drums (6600 gallons).

C. Equipment:

1. Forklift
2. Pallets

D. Closure Schedule:

1. Removal of Inventory - Total time to schedule trucks into facility, load drummed material, and clean (if necessary), and remove containment area is anticipated at a maximum of five (5) days.

   Because this facility functions strictly as a storage facility with no transferring or treatment at the location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination was necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontaminated material could be shipped with inventory for recycling.

2. Removal Of Inventory:

All waste and waste containers will be sent to McKesson Envirosystems (formerly Inland Chemical). We fully anticipate all materials in inventory at this facility to be capable of being recycled, but in the event materials are required to be land filled, McKesson Envirosystems has access to this method. No pretreatment would be required before materials were readied for shipment. No treatment or disposal will occur at our location. Prior to loading, all drums are inspected for leakage, damage, and proper labeling. Proper manifest forms will be completed for the movement.

3. Facility Decontamination:

A. The floor of the diked containment area will be steam cleaned using water and the resulting residual placed in a 55 gallon drum for disposal.

B. Amount of waste generated from decontaminant, if required, would not exceed one (1) 55 gallon drum.

C. All wooden pallets used with waste storage would be shipped at the same time as inventory to be landfilled, if they were found to be unfit for further usage.

McKesson Chemical Closure Cost Estimate

Bedford Heights Branch

I. Basic Disposal Charge

110 drums at $65.00 — $7,150.00

II. Warehouse Labor (Loading)

Hourly rate including fringe benefits - 3 hours required. — $33.98

III. Transportation

To McKesson Envirosystems, New Castle, Kentucky
321 miles @ $1.50/mile — two loads. — $963.00

IV. Equipment Cost

Forklift at $4.50/hour — $13.50

V. Decontamination Cost

Secondary Containment Area Cleaning 2 hours @ $30.00/hour	$60.00	
Disposal of Cleanup residue 2 drums @ $65.00	$130.00	
Disposal of Pallets	$100.00	
Laboratory Services	$100.00	

VI. Contingencies at 20% of Subtotal of $8550.48 — $390.00

VII. Engineer Certification — $1710.10

Total Cost of Closure — $300.00

$10,560.58

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT VI
CONTAINMENT SYSTEM PLANS, SPECIFICATIONS AND OPERATION & MAINTENANCE PROCEDURES

McKesson Chemical Company
U.S. EPA FACILITY ID #: OHD-071-107-791

McKesson Chemical Company

Secondary Containment System Design and Operation

(40 CFR Sec. 122.25(b)(1))

All 55 gallon steel containers which will be utilized to store off-site generators' waste materials at a McKesson Chemical Company storage facility will be held pending reshipment in a designated secondary containment area.

The active outside storage area of the facility as shown in the Part A plot plan (revised from the original version submitted to Region V dated November 18, 1980) consists of a concrete paved area approximately 45,000 square feet in size to the West and North of the warehouse. The yard area is concrete at least six inches thick.

The waste storage containment area is planned to be a bermed rectangle 9 inches high, 10 feet by 30 feet. It will be located at right angles to the warehouse wall, about 15 feet from the ramp — providing forklift access from the warehouse to the yard. The base of the bermed area is of concrete with a compressive strength of at least 3000 psi. The 9 inch berm is also concrete. The heaviest drum of waste material to be handled at this facility would not exceed 700 pounds; maximum load on the concrete surface would be four such drums stacked two-high. The rectangular design of the containment area permits a double row of six pallets each. A permanent layer of pallets will be placed inside the rectangle. Enough space is available on both long sides of the rectangle (30 feet) so that pallets of drums of waste material can easily be placed onto or taken off the permanent pallet layer over the berm by conventional forklift maneuvering. This arrangement of containers also facilitates inspection of individual drums for any leakage. The concrete base and its junction with the berm or integral and no leakage outside the containment area can occur.

This secondary containment area can contain 1683 gallons of waste liquid at capacity calculated as follows:

30 feet X 10 feet X 9 inches = 225 cubic feet

1 cubic foot = 7.48 gallons

225 cubic feet X 7.48 = 1683 gallons

The anticipated maximum number of 55 gallon drums of material to be stored within the 10 foot by 30 foot storage areas at any one time is 110. Given a minimum outage in a given drum of 1 gallon, at the maximum anticipated storage quantity of drums, a total of 5940 gallons of material would be present. Utilizing the required 10% containment ratio of the total volume of the maximum number of containers of material stored, the concrete bermed containment area would be required to hold 594 gallons.

The difference between the 1683 and 594 gallon figure (1089 gallons) is considered sufficient to provide for substantial rainfall (or melted snow) in addition to the required allowance for drum leakage. Statistics provided by the Soil Conservation Service of the U.S. Department of Agriculture for this part of Ohio indicate a 100-year, 24-hour rainfall to be no more than 5 inches. This translates in a 300 square foot area to be 125 cubic feet, or 935 gallons. The total of 594 gallons (potential leak) and 935 gallons (100-year incident) is well within the capacity of the projected bermed containment area.

Should any waste material leakage from drum(s) be present in the containment berm area, a sample will be drawn and taken to a laboratory for analysis if the source of the contamination is not obvious. All released liquid present in the bermed area will be collected and placed into drums by use of a portable pump. Logging and necessary reports as warranted by the nature and severity of any such incident will be made to the appropriate Company personnel and Government agencies.

Since all containers while in storage remain on a double layer of wood pallets, contact of the drums with any accumulated liquid inside the bermed area is impossible.

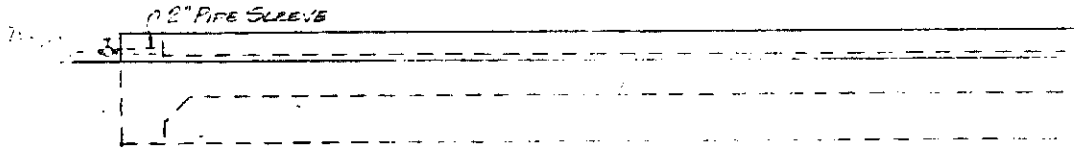
This facility of McKesson is compact, and the bermed secondary containment area will be so located that it is under constant scrutiny. Certainly the level of any accumulated precipitation will be checked promptly as such weather conditions occur, recognizing the need to prevent overflow. If the appearance of any such accumulation raises suspicion that it might be contaminated, it will be sampled and tested either at a local testing laboratory or a McKesson laboratory before it is discharged. The accumulated liquid is to be emptied promptly once any significant level of liquid is reached, recognizing the need to maintain the contained area as empty as possible in case of a spill. An emptying procedure that has proved satisfactory at other McKesson locations is to locate a manually-operated valve through the narrow dimension of the bermed rectangle. A sample can be drawn through this outlet and inspected for odor, cloudiness, or an insoluble layer of liquid — all signifying possible contamination — prior to release to the sewer.

In order to facilitate taking any samples necessary, as well as to insure maximum drainage of the containment area, a sump will be installed in the lowest point within the berm. The branch will have in its possession an appropriate pump, available at all times.

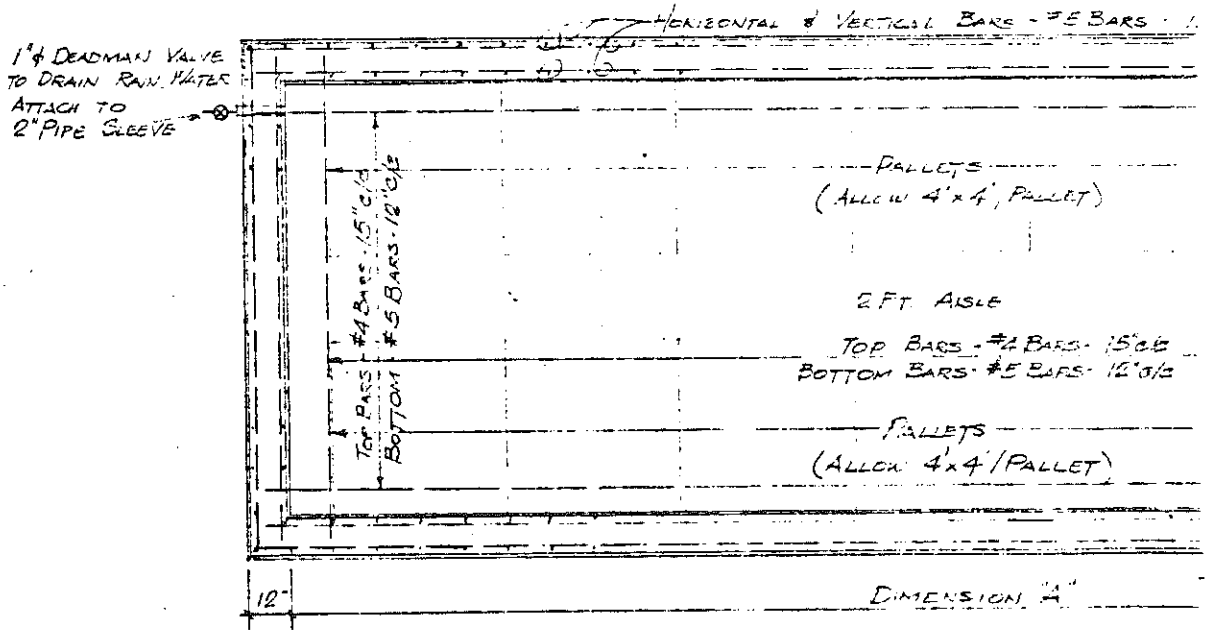
4	[illegible]	20'	10'	6"
10	[illegible]	40'	10'	6"
5	(40 Drums)	20'	5'	6"
7	(56 Drums)	30'	5'	6"

General Notes:

1. [illegible]
2. [illegible], 60 [illegible]
3. Minimum 1/2" [illegible] Cover [illegible]

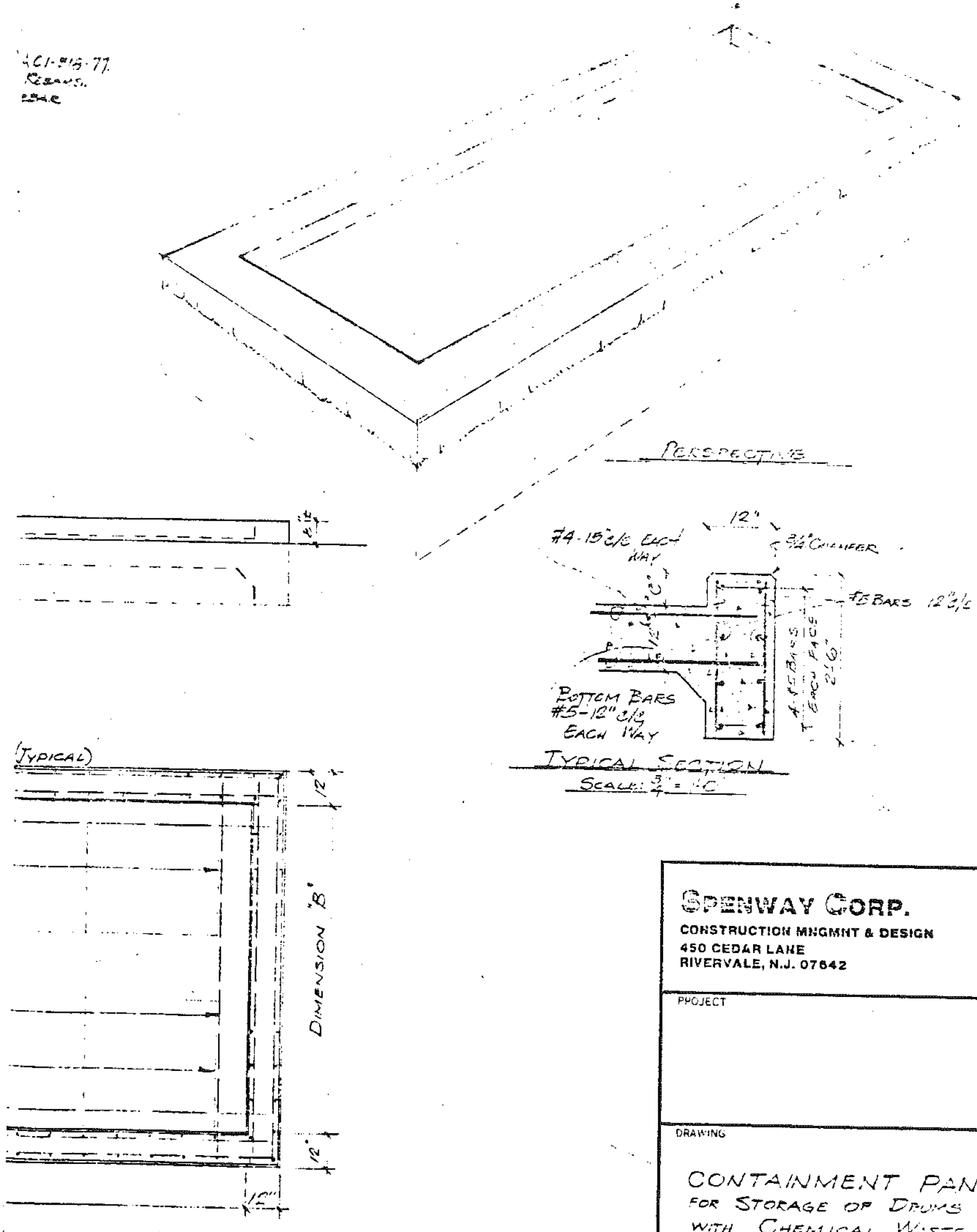


ELEVATION



PLAN

4 - 55 Gal. Drums / Pallet
2 Pallets High



SPENWAY CORP.
CONSTRUCTION MNGMNT & DESIGN
450 CEDAR LANE
RIVERVALE, N.J. 07642

PROJECT

DRAWING

CONTAINMENT PAN
FOR STORAGE OF DRUMS
WITH CHEMICAL WASTE

FRANK E. PANNONE
PROFESSIONAL ENGINEER
92 Knickerbocker Road Cresskill, New Jersey 07626

ENGINEERING LICENSES

N.Y. - 39516	N.J. - [illegible]
Penn 021098-E	Ohio - E 40549
Mass -	Conn. - 15246
N.H. -	Fla. - PE 0023669

Frank E. Pannone

DRAWN BY F.E.P	DRAWING NO. CW-2
CHKD BY	
DATE 19 January 82	
SCALE As noted	
JOB NO	

These plans are an instrument of service and are the property of the [illegible]. Infringements will [illegible]

Contractor shall verify all conditions and dimensions [illegible] responsible [illegible]

CW-2 1

PART B DOCKET LOG

Please print

Facility MC KESSON CHEMICAL COMPANY

I.D. # OHD 071 107 791

DOCKET LOG INITIATED

Item No.	Item Date	Description	Item Filed*
089-1	—	Log	Sec 1
089-2	DEC 28, 1982	LETTER: DONALD BLACK, OPERATIONS DEPT, McKESSON CHEM CO, TO KATHY HOMER, SIO-OH, EPA	SEC 2
089-3	DEC 28, 1982	PART B PERMIT APPLICATION / BOUND WITH YELLOW COVER / IDENTIFIED AS COPY 2	FOLDER 2
089-4	Jan 18 1983	LETTER: W. Miner to T. Crepeau	Sec 2
089-5	FEB 4, 1983	COMPLETENESS REVIEW / USEPA / PREPARED BY JAMES MAYKA, OH/MN UNIT	SEC 4
089-6	FEB 17, 1983	LETTER: PAUL FLANIGAN, CHIEF, ENGRG SECTION, OEPA-DHMM TO KATHY HOMER W/COMPLETENESS CHECKLIST ATTACHED	SEC 2
089-7	FEB 17, 1983	A. COMPLETENESS CHECKLIST / OEPA	SEC 4
089-8	FEB 28, 1983	PHONE MEMO: JAMES MAYKA W/LAURA WHITACRE, OEPA, CO, COLUMBUS	SEC 2
089-9	MAR 1, 1983	LETTER: WILLIAM MINER, CHIEF, TPCS, USEPA TO DONALD BLACK	SEC 2
089-10	MAR 1, 1983	LETTER: WILLIAM MINER TO TOM CREPEAU, CHIEF PERMITS/MANIFESTS SECTION, OEPA-DHMM	SEC 2
089-11	MAR 3, 1983	MEMO: "RAI'S" TO DAN BANASZEK, CHIEF, OH/MN UNIT, USEPA	SEC 3
089-12	MAR 7, 1983	PRELIMINARY TECHNICAL ANALYSIS / PART B / J MAYKA	SEC 4
089-13	MAR 9, 1983	LETTER: J MAYKA TO LAURA WHITACRE W/089-12 AS ENCLOSURE	SEC 2
089-14	MAY 20, 1983	LETTER: DON BLACK TO KAREN HEYOB W/ATTACHMENTS	SEC 2
089-15	(MAY 20, 1983)	A. ATTACHMENTS -- MARCH 30, 1983 LTR + INSERTION PAGES STAPLED + PLOT PLAN +	FOLDER 2
089-16	—	REVISED CONTINGENCY PLAN	—
089-17	MAY 24, 1983	MEMO: RAIU TO D. BANASZEK	SEC 3
089-18	MAY 24, 1983	LETTER: PAUL FLANIGAN TO K. HOMER W/ATTACHED PRELIM DRAFT PERMIT	SEC 2
089-19	(MAY 24, 1983)	A. ATTACHED PRELIM DRAFT PERMIT (PREPARED BY OEPA)	FOLDER 2
089-20	JUNE 6, 1983	MEMO: W MINER TO C CHRISTENSON	SEC 3
089-13a	MAR 30, 1983	LETTER: A.H. KOHNEN, SOLVENT RESOURCE RECOVERY TO DON BLACK	SEC 2
089-21	JUNE 6, 1983	LETTER: DON BLACK TO KAREN HEYOB W/ATTACHMENTS	SEC 2
—	(JUNE 6, 1983)	A ATTACHMENTS INCORPORATED INTO PART B APPLICATION	FOLDER 2

089-1

*Folder 1 is arranged by sections.

PART B DOCKET LOG

Please print

Facility MCKESSON CHEMICAL COMPANY (Bedford Heights)

I.D. # OHD 071 107 791

Item No.	Item Date	Description	Item Filed*
089-22A	7/6/83	ORIGINAL STATEMENT OF BASIS	SEC. 5
089-22B	7/6/83	ORIGINAL DRAFT PERMIT	FOLDER 3
089-23	7/13/83	LETTER TO LIBRARY	SEC. 6
089-24	7/20/83	SPECIAL LETTER - PUBLIC NOTICE	SEC 6
089-25	7/20/83	REGULAR LETTER - PUBLIC NOTICE	
089-26	7/20/83	MAILING LIST	
089-27	7/22/83	PUBLIC NOTICE	
089-28	7/22/83	Verification of Public Notice	
089-29	7/22/83	PAID PUBLIC BROADCAST	
089-30	7/22/83	ORDER FOR RADIO BROADCAST & VERIFICATION	
089-31	7/28/83	PUBLIC SERVICE ANNOUNCEMENT	
089-32	8/25/83	ATTENDANCE CARDS AT PUBLIC HEARING	
089-33	9/8/83	TRANSCRIPT	
089-33A	9/15/83	COMMENT - TO USEPA ~~FROM FISH & WILDLIFE~~	SEC. 6
089-34	10/11/83	RESPONSIVENESS SUMMARY (RS)	SEC. 6
089-35	10/11/83	MAILING LIST (RS) (MAILED 10/12/83	SEC. 6
089-36	10/11/83	FINAL PERMIT	FOLDER 4
089-37	9/29/83	Letter: B. Constantelos to C. Mace forwarding permit	
089-38	4/7/86	Letter: Re prior releases	Sec 2
	1/24/90	Notification Ltr.	

* Item is numbered by section.